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United States
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Forest Service
Tongass National Forest

R10-MB-532b

FEIS

FINAL ENVIRONMENTAL
IMPACT STATEMENT

APPENDICES

COUVERDEN TIMBER SALES

Tongass National Forest



July 2005

APPENDIX A

REASONS FOR SCHEDULING THE ENVIRONMENTAL ANALYSIS OF COUVERDEN PROJECT AREA TIMBER SALE

Appendix A

Reasons for Scheduling the Environmental Analysis of the Couverden Timber Sales

Introduction

This appendix provides an explanation of the rationale for a specific timber harvest project and its importance to the multi-year timber program on the Tongass National Forest. To accomplish this, the following questions are answered:

- ♦ Why is timber from the Tongass National Forest being offered for sale?
- ♦ How does the Forest Service Develop Forecasts about Future Timber Market Demand?
- ♦ What steps must be completed to prepare a sale for offer?
- ♦ How does the Forest Service maintain an orderly and predictable timber sale program?
- ♦ How does the Forest Service decide where timber sale projects should be located?

Coordinated timber sale planning is essential for meeting the goals of the Tongass Land Management Plan and to provide an orderly flow of timber to local industry. To determine the volume of timber to offer each year, the Forest Service can look to current market conditions and the level of industry operations. However, the planning process for timber harvest projects requires the Forest Service to rely on projections of future harvest levels to decide how many timber sale projects to begin each year. This document explains how the Forest Service uses information about future markets and past experience with timber sale planning to determine the volume of timber that needs to be started through this process each year. This appendix relies heavily on the current annual timber demand analysis and the most recent 10-year timber sale schedule. The schedule for FY 2005 has not been approved at this time.

Why is Timber from the Tongass National Forest Being Offered for Sale?

National Legislation

On a national level, the legislative record is clear about the role of the timber program in the multiple-use mandate of the national forests. One of the original objectives for creation of national forests was to provide natural resources, including timber, for the American public. The Organic Act of 1897 (partially repealed in 1976) directed the agency to manage the forests in order to "improve and protect the forest ... [and] for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of the citizens of the United States" (emphasis added). The Multiple-Use Sustained Yield Act of 1960 directs the Forest Service to administer federal lands for "outdoor recreation, range, timber, watershed, and wildlife and fish purposes."

The National Forest Management Act (NFMA) of 1976 states that "the Secretary of Agriculture...[may sell, at not less than appraised value, trees, portions of trees, or forest products located on National Forest System Lands]." Although the heart of the Act is the land management planning process for national forests, the Act also sets policy direction for timber management and public participation in Forest Service decision-making. Under NFMA, the Forest Service was directed to "limit the sale of timber from each national forest to a quantity equal to or less than a quantity which can be removed from such forest annually in perpetuity on a sustained-yield basis".

The NFMA directs the Forest Service to complete land management plans for all units of the National Forest System. Forest Plans are developed by an interdisciplinary team to provide for the coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness. Forest plans designate areas of national forest where different management activities and uses are considered appropriate including those areas suitable for timber harvest.

Timber from the Tongass National Forest is being offered for sale as part of the multiple-use mission of the Forest Service identified in the public laws guiding the agency. In addition, Alaska-specific legislation and the Tongass Forest Plan direct the Forest Service to seek to provide timber to meet market demand, subject to the budget appropriations process.

Alaska-Specific Legislation

Legislation unique to Alaska directs the Forest Service to maintain a commercial timber program. The Alaska National Interest Lands Conservation Act (ANILCA) and the Tongass Timber Reform Act (TTRA) provide direction on the issue of Tongass timber supply. Section 101 of TTRA amended the ANILCA timber supply mandate and fixed budget appropriations and replaced them with the following text in Section 705 (a):

Sec. 705. (a) Subject to appropriations, other applicable law, and the requirements of the National Forest Management Act of 1976 (P.L. 94-588); except as provided in subsection (d) of this section, the Secretary shall, to the extent consistent with providing for the multiple use and sustained yield of all renewable forest resources, seek to provide a

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Management
Plan (Forest
Plan, as
amended)**

supply of timber from the Tongass National Forest which (1) meets the annual market demand for timber from such forest and (2) meets the annual market demand from such forest for each planning cycle.

The Record of Decision for the Tongass Land Management Plan Revision (Forest Plan) was signed by the Alaska Regional Forester in 1997. The Forest Plan incorporated new resource information and scientific studies and reflected an extensive public involvement process.

There was direction to supplement the 1997 Final EIS to evaluate and consider roadless areas within the Tongass for recommendation as potential wilderness areas as part of the March 2001 US District Court decision on litigation on the 1997 Forest Plan. The Record of Decision for the Supplemental Environmental Impact Statement was signed in February 2003. The No-action Alternative was selected; no additional lands were recommended for Wilderness designation and no changes were made to the Land Use Designations from the 1997 Record of Decision. The 1997 Forest Plan defines appropriate activities within each LUD. Approximately 74 percent of the Tongass is allocated to LUDs where commercial timber harvest is not allowed.

Amendments have been made to the 1997 Forest Plan, primarily to modify small Old-growth Habitat Reserves to meet Forest Plan criteria. These amendments have been accomplished with environmental analysis and are documented in decision documents. Due to those modifications, Land Use Designations (LUD) in certain areas have changed from development LUDs that allow timber harvest to Old-growth Habitat LUD or changed from the Old-growth Habitat LUD to development LUDs. Those modifications are tracked and displayed in the annual Tongass monitoring report.

The effects to resources in the Final EIS for the 1997 Forest Plan were analyzed as if the full timber harvest allowed under each alternative would occur over the next decade and into the future. In that way the Forest Plan analysis displayed the maximum environmental effects that could be reasonably foreseen. Since substantially less timber volume and acres have been harvested in the first 8 years of Forest Plan implementation than was analyzed, the effects on resources are expected to be less than projected in the 1997 Final EIS. The environmental effects analysis in the Forest Plan estimated 267 MMBF and 10,200 acres would be harvested per year. Forest Plan monitoring indicates that average annual harvest has been less than half of those projections.

Allowable Sale Quantity (ASQ)

The ASQ serves as an upper limit on the amount of timber that may be offered for sale each year as part of the regularly scheduled timber sale program. The Record of Decision for the 1997 Forest Plan states:

The maximum amount of timber that could be harvested (Allowable Sale Quantity or ASQ) during the first decade of the Forest Plan implementation is an average of 267 MMBF per year. A timber volume level less than the ASQ is likely to be offered over the next few years,

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given current market conditions, the transition that both the timber industry and the Forest Service are experiencing, and the current amount of appeals and litigation.

The ASQ is the amount of sustainable timber that can be harvested from suitable forested lands allocated to development by the Forest Plan, in accordance with standards and guidelines and other limitations set out in the plan.

It consists of two separate Non-Interchangeable Components (NICs) called NIC I and NIC II. The NIC I component includes lands that can be harvested with normal logging systems including helicopter logging with less than ¾ mile yarding distance. The NIC II component includes land that has high logging costs due to isolation or special equipment requirements. Most of these NIC II lands are presently considered economically and technically marginal.

There are two purposes of partitioning the ASQ into two components: to maintain the economic sustainability of the timber resource by preventing the over-harvest of the best operable ground and to identify that portion of the timber supply that may not be harvested because of marginal economic conditions.

With regard to timber production sustainability, the decision for the 1997 Forest Plan further states:

The timber resource will be managed for production of sawtimber and other wood products from timberlands available for sustainable timber harvest, on an even-flow, sustained-yield basis and in an economically efficient manner. The Tongass National Forest will seek to provide a timber supply sufficient to meet the annual market demand for Tongass National Forest timber and the market demand for the planning cycle.

The Tongass National Forest will continue to allow timber harvest while maintaining sustained yield and multiple-use goals. The forest-wide standards and guidelines for timber include general direction to "[e]nsure that silvicultural systems other than clearcutting are considered through an appropriate project level analysis process. However, uneven-aged management systems will be limited to areas where yarding equipment suited to selective logging can be used....

Roadless Area Conservation Rule

The January 2001 Roadless Area Conservation Rule prohibited most timber harvest and road construction in inventoried roadless areas on National Forest System lands. In July 2003, the US District Court for the District of Wyoming set aside the roadless rule and permanently enjoined its implementation. Effective January 2004, after analysis of current conditions and public comment, the Department of Agriculture amended the roadless rule so that actions on the Tongass are not subject to the prohibitions against commercial harvest and road building in the roadless rule. Management of inventoried roadless areas on the Tongass is now governed by the 1997 Forest Plan. In May 2005, the Forest Service adopted a new rule that established a petitioning process that provides Governors the ability to request adjustments to management of inventoried roadless areas on

national forests within their states. An analysis of the effects to roadless areas within the project area has been included as part of the analysis for this project. This project is consistent with agency policy and procedures and has been designed to meet the management direction, goals and objectives, and standards and guidelines in the Forest Plan.

How does the Forest Service Develop Forecasts about Future Timber Market Demand?

Annual Market Demand

Consistent with the provisions of the Tongass Timber Reform Act, the Tongass National Forest makes two determinations on volume to be offered. The first is an estimate on volume to be offered for the current year, based on a forecast of annual timber market demand. Annual market demand is analogous to assessing industry performance in the short term. The general approach is to consider the timber requirements of the region's sawmills at different levels of operation and under different assumptions about market conditions and technical processing capability.

Timber inventory requirements are acknowledged and included in the timber demand forecast. These assumptions provide a basis for estimating the volume of timber likely to be processed by the industry as a whole in any given year. The volume of timber likely to be purchased is equal to the volume needed to make up any inventory shortfall in addition to the volume likely to be harvested in the coming year.

The annual market demand forecast is a methodology used to set the short term goals for the Tongass timber sale program—it is the projected volume of Tongass timber needed to meet annual market demand. The estimated annual market demand is the volume the Forest plans to offer for sale in the current year of the 10-year sale schedule, pending sufficient funding.

The reports *Responding to the Market Demand for Tongass Timber* (Morse, 2000a) and *Tongass National Forest Timber Sale Procedures* (Morse, 2000b) document the formulas and procedures used in forecasting annual market demand. The procedures are designed to be flexible given the uncertainty associated with forecasting market conditions. This is especially difficult in Southeast Alaska because of the structural transformation underway in the timber industry. The methodology accounts for the fact the Forest Service timber sale program cannot quickly respond to market fluctuations and allows the industry to accumulate adequate volume under contract. The methodology includes provisions to monitor industry behavior and includes ways to adjust timber sale program levels to reflect harvest activity.

The planned offer could include a combination of new, previously offered, and reconfigured timber sales. Both green timber and salvage will be components of the program. Offerings will consist of those targeted for Small Business qualified firms, as well as a portion of the volume being made available for the open market.

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Market Demand over the Planning Cycle

The second level of market demand is for the volume needed over the planning cycle (usually 10 years). The Forest Service documents market demand projections and the means of implementation through a 10-Year Timber Sale Plan. To keep the planning cycle demand current, each year the 10-Year Timber Sale Plan is updated for each ranger district, whereby the current year is dropped at the end of the fiscal year and a new year is added.

Demand projections are important for timber sale program planning. They provide guidance to the Forest Service to request budgets, to make decisions about workforce and facilities, and to indicate the need to begin new environmental analysis for future program offerings. They also provide a basis for expectations regarding future harvest, and thus provide an important source of information for establishing the schedule of probable future sale offerings. The weight given to the projections will vary depending on a number of factors, such as how recently they were done and how well they appear to have accounted for recent, site-specific events in the timber market.

Table A-1
Projected and Actual Tongass Harvest (MMBF)

Projected Harvest ^{1/}				Actual Harvest
Fiscal Year	Low	Medium	High	
1998	77.3	86.0	112.2	119.8
1999	86.4	99.3	127.9	145.8
2000	95.5	115.9	142.7	146.8
2001	104.6	129.0	157.7	47.8 ^{2/}
2002	113.7	134.9	173.1	33.8
2003	122.8	140.8	188.9	50.8
2004	131.9	146.5	205.0	46
2005	131.9	152.2	221.4	
2006	131.9	157.8	238.2	
2007	132.0	163.4	255.3	
Average	112.8	132.6	182.2	

1/ From Morse (2000a) and Brooks and Haynes (1997).

2/ Truncated logging season due to litigation.

What Steps Must Be Completed to Prepare a Sale for Offer?

The Tongass National Forest's timber sale program is complex. A number of projects are underway at any given point in time, each of which may be in a different stage of planning and preparation. A system of checkpoints, or "gates" (Forest Service Handbook 2409.18, Chapter 10), helps the Forest Service track the accomplishments of each stage of a project from inception to contract termination.

Gate 1 – Initial Planning of Timber Sale Project

A Timber Sale Project Plan, often referred to as a Position Statement, is a brief analysis of the project area with the intent of determining the feasibility of a potential timber sale. After the Position Statement is developed, the Forest Service decides whether the project area merits continued investment of time and funds in sale planning.

Gate 2 – Project Analysis, Sale Area Design, and Decision

This step is commonly referred to as the "NEPA" phase and includes field work, public scoping, analysis, draft disclosure of the effects of the project on the environment, public comment, final analysis and disclosure, decision, and potentially administrative appeals and litigation. Gate 2 activities are generally completed 2 to 3 years before a sale is offered. Legislation, policy changes, and appeals and litigation have recently extended completion of some projects for a much longer timeframe, often doubling the desired time frame.

Gate 3 – Preparation of a Timber Sale

During this step, the information and direction included in the decision document from Gate 2 is used to layout units and design roads on the ground. Additional site-specific information is collected at this time. In order to maintain an orderly flow of sales, Gate 3 activities should be completed 1 to 3 years before a sale is offered.

Gate 4 – Advertise a Timber Sale

The costs and value associated with the timber sale designed in Gate 3 are appraised and packaged in a timber sale contract. The contract is a legally binding document that directs a prospective timber sale purchaser how the sale must be harvested to be in conformance to the project decision document. This step occurs during the final year of the project development and culminates with the advertisement of the project for sale.

Gate 5 – Bid Opening

Gate 5 is completed with the opening of bids for the project. If a bid is submitted, contractual provisions govern when the award of the sale takes place, when the sale will be completed (contract length and operation season), and how timber removal is to occur.

Gate 6 – Award a Timber Sale Contract

Gate 6 is the formal designation of a contract between a bidder and the Forest Service.

How does the Forest Service Maintain an Orderly and Predictable Timber Sale Program?

Pools of Timber (Pipeline Volume)

As discussed earlier, the Forest Service tracks the accomplishment of the different steps of development of each timber sale with the Gate System process. From a timber sale program standpoint, it is also necessary to track and manage multiple projects through a “pipeline” of time as projects collectively move through the Gate System. Because of the timeframes needed to accomplish a given timber sale and the complexities inherent in timber sale project and program development, it is necessary to track various timber sale program volumes from Gate 1 through Gate 6.

The goal of the Tongass National Forest is to provide an even flow of timber sale offerings on a sustained yield basis to meet market demand. In recent years, this has been difficult to accomplish due to a combination of uncertainties such as delays related to appeals and litigation; changing economic factors, such as rapid market fluctuations; and industry related factors, such as changes in timber industry processing capabilities. To achieve an even flow of timber sale offerings, ‘pools’ of volume in various stages of the Gate System are maintained so volume offered can be balanced against current year demand and market cycle projections

Today, upward trends in demand are resolved by moving out-year timber projects forward, which may leave later years not capable of meeting the needs of the industry. In other instances, a number of new projects are started based on today’s market but will not be available for a number of years. By the time the added projects are ready for offer, the market and demand for this volume may have changed. Three pools of timber volume are tracked to achieve an even flow of timber sale offerings.

The objective of the timber pools concept is to maintain sufficient volume in preparation and under contract to be able to respond to yearly fluctuations in a timely manner. Refer to Table A-2, which displays the projected volume in each pool, as well as the goal for volume. Based on historic patterns, the Tongass has established a goal for the volume to be maintained in each of the timber pools. Appeals and litigation can cause timber sale projects to be reevaluated to ensure they meet current standards and direction, which can cause delays in making projects available to move through the pools, thereby not fully meeting the goals for volumes in each pool.

Pool 1 - Timber Volume Under Analysis (Gate 1 and Gate 2)

Volume in Gate 1, the initial planning step, represents a large amount of volume, but represents a relatively low investment in each project. This relatively low investment level offers the timber program manager a higher degree of flexibility and thus, does not greatly influence the flow of volume through the pipeline.

Gate 2, Timber volume under environmental analysis, includes sales being analyzed and undergoing public comment through the NEPA process. This pool includes any project that has started the scoping process through those

Table A-2
Accomplishments in Gate System and Timber Pools (MMBF)

Pipeline Pool Volume	Goal	Planned by End FY 05
Pool 1		
Volume Under Analysis (Gate 1 and 2)	594 ^{1/}	400
Pool 2		
Volume Available for Sale (Gate 3, Gate 4 and Gate 5)	172 ^{2/}	154
Pool 3		
Volume Under Contract (Gate 6)	396 ^{3/}	100 ^{4/}

1/ The goal for volume under analysis is approximately 4.5 times the projected harvest for the current year (132 MMBF for 2005 based on PNW estimates). Volume under analysis includes all volume in projects from the Notice of Intent through completion of the environmental analysis for sales planned.

2/ The goal for volume available for sale is to have at least 1.3 times the projected harvest for the current year (132 MMBF) in sales that have approved NEPA and completion of timber sale preparation.

3/ The goal for volume under contract is for purchasers to have 3 times the volume under contract as projected for harvest for the current year (132 MMBF).

4/ Includes volume under contract at beginning of the fiscal year (not including contracts in the process of being cancelled); the planned accomplishment in Gate 6 (assumed to be the same as Gate 5); minus the projected harvest.

projects ready to have a decision issued. In addition, tracking how much volume is involved in appeals or litigation may be necessary to determine possible effects on the flow of potential timber sales. Volume in appeals and litigation is tracked as a subset of this pool as necessary (Table A-3).

Based on historic patterns, the Tongass has established a goal for the pipeline volume to be maintained in each of the timber pools. The goal for Pool 1 is to be maintained at approximately 4.5 times the amount of the projected harvest to account for projects at various stages of analysis. That goal reflects a number of factors which can lead to a decrease in volume available, such as a decision in Gate 1 to drop further analysis in a particular planning area (called the “no go” decision), a falldown in estimated volume between Gate 1 and Gate 2, and volume not available for harvest due to appeals or litigation.

Pool 2 - Timber Volume Available for Sale (Gates 3, 4 and 5)

Timber volume available for sale includes sales for which environmental analysis has been completed, and have had any administrative appeals and litigation resolved. Enough volume in this pool is needed to be maintained to be able to schedule future sale offerings of the size and configuration that best meets market needs in an orderly manner.

As a matter of policy and sound business practice, the Forest Service announces probable future sale offerings through the Periodic Timber Sale Announcement. Recent delays at Gate 2 have affected sale preparation and have made scheduling uncertain. At Gate 4, sales have been fully prepared and appraised, and are available to managers to advertise for sale. This allows potential purchasers an opportunity to do their own evaluations of these offerings to determine whether to bid, and if so, at what level.

Appendix A

Table A-3

Timber Volume Involved in Appeals and/or Litigation (as of 04/30/05)

Timber volume remanded on appeals ^{1/}	35 MMBF
Timber volume involved with litigation	<230 MMBF
Timber volume under contract enjoined from implementation	9 MMBF

1/ Remanded – Decision overturned during internal review. Does not include that volume in decisions currently in the appeal period or undergoing an appeal.

Timber in this pool can include a combination of new sales, previously offered unsold sales, and remaining volume from cancelled sales. The goal is to maintain Pool 2 at approximately 1.3 times the amount of the projected harvest to allow flexibility in offering sales.

Pool 3 - Timber Volume under Contract (Gate 6)

Timber volume under contract contains sales that have been sold and a contract awarded to a purchaser, but which have not yet been fully harvested. Contract length is based on the amount of timber in the sale, the current timber demand, and takes into account the accessibility of the area for mobilization. The longer the contract period, the more flexibility the operator has to remove the timber based on market fluctuations. Timber contracts typically initially give the purchaser 3 years to harvest and remove the timber purchased. Analysis of recent Tongass timber sales indicates an average sale length of about 6 years.

The Tongass attempts to maintain roughly 3 years of unharvested volume under contract to the industry as a whole. This volume of timber is the industry's dependable timber supply, which allows adaptability for business decisions. This practice is not limited to the Alaska Region, but is particularly pertinent to Alaska because of the nature of the land base. The relative absence of roads, the island geography, the steep terrain, and the consequent isolation of much of the timber land means that timber purchasers need longer-than-average lead times to plan operations, stage equipment, set up camps, and construct roads prior to beginning harvest.

A combination of projected harvest and projected demand is used to estimate the volume needed to maintain an even flow timber sale program. As purchasers harvest timber, they deplete the volume under contract. Timber harvest is then planned and offered by the agency as sales that give the industry the opportunity to replace this volume and build or maintain their working inventory. Although there will be variation for practical reasons from year to year, in the long-run over both the high points and low points of the market cycle, the volume harvested will equal the timber volume sold.

The goal for Pool 3, volume under contract, is to maintain at approximately 3 times the amount of projected harvest to allow the purchasers to have a continuous supply of timber volume available for harvest so they can plan their operations.

Timber harvest projects require site-specific environmental analysis that usually is documented in an environmental assessment (EA) or an environmental impact statement (EIS). The public is notified of the

**How Appeals
and Litigation
Affect the
Timber Sale
Program**

analysis and is provided the opportunity to comment on proposals and file an appeal on decisions.

When decisions are appealed and affirmed through the appeal process, the project can still be litigated. Litigation can be a lengthy process. Although litigation does not preclude offering timber for sale, the Forest Service and potential purchasers are often reluctant to enter into a contract where the outcome is uncertain. The outcome of litigation affects the Forest's ability to provide a reliable timber supply.

**How Does the Forest Service Decide Where
Timber Harvest Projects should be Located?**

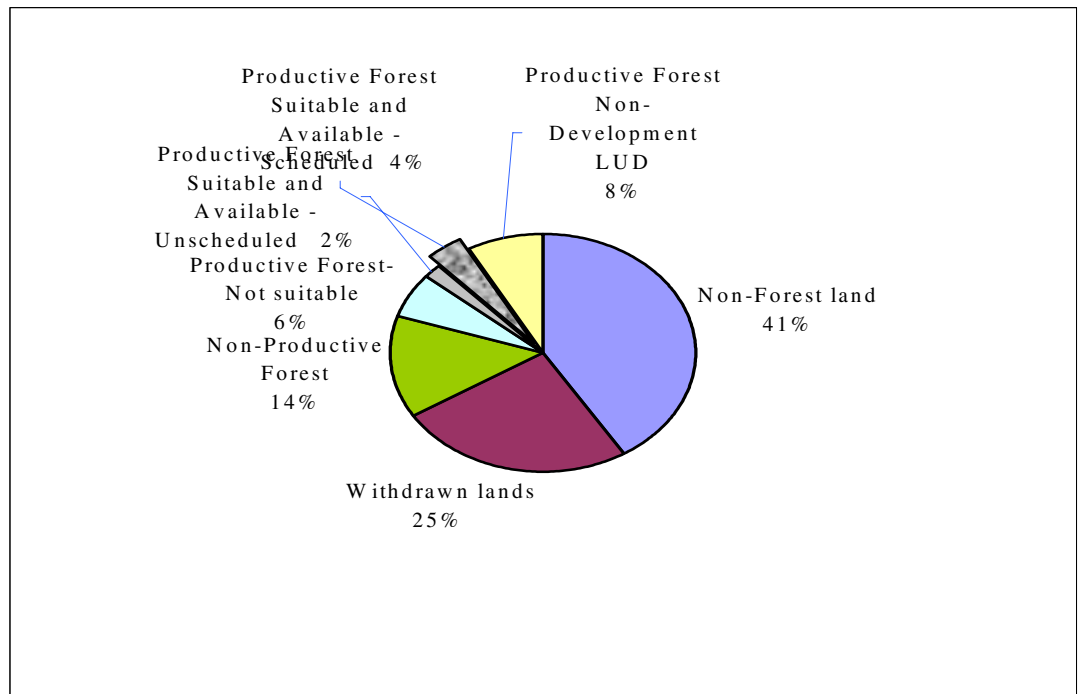
The location of timber sale projects is based first on the land allocation decisions in the Forest Plan. Under the 1997 Forest Plan, lands designated for possible timber harvest are in the development Land Use Designations (LUDs), primarily the Timber Production, Modified Landscape, and Scenic Viewshed Land Use Designations.

**Timber
Resource Land
Suitability**

The second consideration is the suitability of the land for timber production. Many acres within the development LUDs are not suitable for timber production due to poor soils or steep slopes. The process for determining the suitability of the land is found in the Forest Plan, Appendix A. Chart A-1 depicts the classification of all the lands within the Tongass National Forest. Four percent of the Tongass land base, the suitable, available and scheduled forest land, provides the land base for the Allowable Sale Quantity of 267 MMBF per year. Under the 1997 Forest Plan, the remainder of the land, approximately 96 percent, does not allow, is not scheduled, or is not physically suitable.

Appendix A

Chart A-1
1997 Forest Plan Timber Resource Suitability Analysis



Non-Forest land – Land that has never supported forests, e.g. muskeg, rock, ice

Withdrawn Lands – Lands designated by Congress, the Secretary of Agriculture, or Chief for purposes that preclude timber harvest, e.g. Wilderness Areas.

Non-productive Forest – Forest land not capable of producing commercial wood on a sustained yield basis.

Productive Forest, Not suitable, Physical Attributes – Forest land unsuitable for timber production due to physical attributes (steep slopes, soils, etc) and/or inadequate information to ensure restocking of trees within 5 years of final harvest.

Productive Forest, Not suitable, Non-development LUD – Productive forest lands where timber production is not allowed due to Forest Plan land use designation e.g. Semi-Remote Recreation, Old-growth Habitat, etc.

Productive Forest, Suitable and Available, Scheduled – Forest land that meets all the criteria for timber production suitability and is available and is scheduled by the Forest Plan over the planning horizon.

Productive Forest Suitable and Available, Unscheduled – Forest land that meets all the criteria for timber production suitability, is available for harvest, however was not scheduled in the Forest Plan model for harvest.

District-Level Planning

The Tongass National Forest is divided into ten ranger districts. For planning and scheduling purposes, the allowable sale quantity has been allocated to the ranger districts based on the Forest Plan modeling (FORPLAN) results of suitable and available acreage. The average annual distribution of the full Forest Plan allowable sale quantity by ranger districts is displayed in Table A-4 (all volumes are identified as sawlog plus utility).

Table A-4
Annual Project Distribution of Forest Plan Allowable Sale Quantity (MMBF)

Ranger District	Non-Interchangeable Component (NIC) ^{1/}	
	NIC I	NIC II
Ketchikan/Misty Fiords	32	7
Thorne Bay	42	9
Craig	33	7
Wrangell	28	6
Petersburg	50	9
Sitka	17	4
Hoonah	7	2
Juneau	7	2
Yakutat	4	1
Admiralty National Monument	0	0
NIC Totals	220	47
ASQ Total	267	

1/ NIC I component - lands that can be harvested with normal logging systems including helicopter logging with less than ¼ mile yarding distance.

NIC II component includes land that has higher logging costs due to isolation or special equipment requirements.

The Forest Supervisor for the Tongass National Forest is responsible for the overall management of the Forest's timber sale program. Included within these responsibilities is making the determination on the amount of timber volume to be made available to industry. Whether or not sufficient funding is appropriated to attain the program is the responsibility of the Congress and the President.

While the Congressional appropriation process is taking place, the Tongass Forest Supervisor directs the District Rangers to develop a timber sale plan that is the best estimation of the potential timber harvest projects to attain the prescribed offer level for the current year based on annual market demand, as well as developing a timber program for the planning cycle, based on the NIC I average for the ranger districts. The offer level for the current year in this plan is based, to the extent possible, on the forecasted annual market demand. Demand may fluctuate from year to year but recent years have shown little change in the annual demand projection. Offerings may vary from year to year but recently they have been in the low market scenario range, as determined by the projected annual demand.

The District Ranger is responsible for identifying and recommending the project areas for the 10-Year Timber Sale Plan. The Ranger's role is to develop and recommend to the Forest Supervisor timber harvest projects that meet Forest Plan goals and objectives. Districts work on various timber sale projects simultaneously, resulting in continual movement of projects through the stages of the timber program pipeline. This schedule allows the necessary time to complete preliminary analysis, resource inventories, environmental documentation, field layout preparations and permit acquisition, appraisal of timber resource values, advertisement of sale characteristics for potential bidders, bid opening, and physical award of the

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timber sale. Project delays through the completion of Gate 2 attributable to legal injunctions and litigation has affected the offer level in recent years. Once all of the Rangers' recommendations are made and compiled into a consolidated schedule, the Forest Supervisor is responsible for the review and approval of the final 10-year timber sale plan.

Some of the considerations the District Ranger takes into account for each project include:

- ♦ The project area contains a sufficient number of suitable timber production acres allocated to development Land Use. Available information should indicate that the timber volume being considered for harvest can be achieved while meeting Forest Plan goals, objectives, and standards and guidelines.
- ♦ To assess other resource use and potential future uses of the area and of adjacent areas and of non-National Forest Service lands.
- ♦ To prioritize efforts in areas where the investment necessary for project infrastructure (roads, bridges, etc.) is achievable with the estimated value of timber in the project area. Where infrastructure already exists, this project would allow any maintenance and upgrade of the facilities necessary for removal of timber volume.

The implementation of the sales on the 10-year plan depends in part on the final budget appropriation to the agency. In the event insufficient budget is allocated, or resolution of pending litigation or other factors delay planned sales, timber sale projects are selected and implemented on a priority basis. Generally, the higher priority projects include sales where investments such as road networks, camps or log transfer facilities have already been established or where land management status is not under dispute. The distribution of sales across the Tongass is also taken into account to distribute the effects of sales and to provide sales in proximity to timber processing facilities. Timber sale projects, scheduled for the current year that are not implemented or the remaining volume of sales that are only partially implemented are shifted to future years in the plan. The sale plan becomes very dynamic in nature due to the number of influences on each district.

The Couverden project meets all laws and regulations governing the removal of timber from National Forest System lands, including Forest Service policies as described in Forest Service manuals and handbooks and the 1997 Forest Plan and ROD. Based on current year and anticipated future timber volume demand and the timber supply requirements of the Tongass Timber Reform Act, the Couverden project is prudent at this time to meet future timber sale needs as demonstrated in the revised 10-Year Timber Sale Plan. The anticipated budget allocations and the availability of resources are sufficient to prepare and offer this project for sale as scheduled.

How Does This Project Fit into the Tongass Timber Program?

The Couverden project is currently in Gate 2, Project Analysis. The amount of volume considered for harvest under the action alternatives ranges from approximately 1 to 5 MMBF to 27.4 MMBF, which would contribute to the Tongass timber sale program. A no-action alternative is also analyzed in this EIS. If an action alternative is selected in the decision for the Couverden project, this volume will be added to the volume available for sale. As described in the Pools of Timber section of this appendix, the volume of timber needed to maintain Pool 1 is 4.5 times the amount of the projected harvest to account for projects at varying stages of analysis for that year.

Currently, forest-wide, the volume under analysis (Pool 1) contains 400 MMBF and includes the Notice of Intent volume for this project. The Couverden project contributes to timber sale program planning objectives to meet the goal of providing an orderly flow of timber from the Tongass on a sustained yield basis to meet timber supply requirements. It is reasonable to be conducting the environmental analysis for this project at this time. The Couverden project is currently proposed for offer in Fiscal Year 2007.

Why is this Project Occurring in this Location?

As displayed in the 1997 Tongass Forest Plan, the suitable and scheduled land base on the Tongass National Forest is capable of supporting an Allowable Sale Quantity of 267 MMBF annually, 220 MMBF of which is considered economical (i.e., the NIC I component) under average market conditions. The Forest Plan analysis assumed all suitable, scheduled timberlands would eventually be planned for harvest to meet the current and projected demand for timber in Southeast Alaska. The relocation of this project to another area is inefficient and potentially contrary to the standards and guidelines of the Forest Plan. This decision is based on the consideration of cumulative effects on other resources from past harvest activities, the location of timber sales under contract, and the eventual use of all suitable and scheduled lands for timber sale projects.

The reasons this project is being considered in this area include:

- ♦ The project area is a development LUD.
- ♦ The project area has a developed road system and an LTF.
- ♦ Past harvest in the project area has been well below the maximum sustainable harvest level for the area.

Effects on subsistence resources from timber harvest are projected to have few differences based on the sequence areas are harvested. Harvesting other areas with available timber on the Tongass National Forest is expected to have greater potential effects on subsistence resources, because of the low level of subsistence use in the Couverden area. Harvest within other areas is foreseeable under the Forest Plan.

There is a long legislative recognition that timber harvest is one of the appropriate activities on national forest, starting with the founding legislation for national forests in 1897. The National Forest Organic Act provides that national forests may be established “to improve and protect the forest within the boundaries of, or for the purposes of securing favorable conditions of water flows and to furnish a continuous supply of timber for the use and necessities of the citizens of the United States.”

Appendix A

Congress's policy for national forest, as stated in the Multiple Use Sustained Yield Act of 1960, is "the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes." Accordingly, Congress has authorized the Secretary of Agriculture to sell trees and forest products from the national forests "at no less than appraised value." The National Forest Management Act directs that forest plans shall "provide for multiple use and sustained yield, and in particular, include coordination of "outdoor recreation, range, timber, watershed, wildlife, fish and wilderness.

In addition to nationwide statutes, section 101 of the Tongass Timber Reform Act directs the Forest Service to seek to meet market demand for timber from the Tongass subject to certain qualifications. It is the goal of the Tongass National Forest to provide an even flow of timber on a sustained yield basis and in an economically efficient manner. The amount of timber offered for sale each year is based on the objective of offering enough volume for sale to meet the projected annual demand. That annual demand projection starts with installed mill capacity, and then looks to industry rate of capacity utilization under different market scenarios, the volume under contract, and a number of other factors, including anticipated harvest and the range of expected timber purchases.

As described by Morse (2000a), in terms of short term economic consequences, oversupplying the market is less damaging than undersupplying it. If more timber is offered than purchased in a given year, the unsold volume is still available for re-offer in future years. The unsold volume would have no environmental effects because it would not be harvested. Conversely, a short fall in the supply of timber can be financially devastating to the industry. The Couverden project could supply from approximately 1 to 5 MMBF to 27.4 MMBF of volume for sale, with harvest potentially beginning in 2007.

APPENDIX B

UNIT CARDS

Appendix B

Unit Cards

The Couverden Timber Sale Unit Cards were published with the Draft EIS. Slightly modified final unit cards have been included in the Project Planning Record and are available for review upon request. Unit cards for the Selected Alternative are published with the Record of Decision.

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APPENDIX C

ROAD CARDS

Appendix C

Road Cards

The Couverden Timber Sale Road Cards were published with the Draft EIS and have been included in the Project Planning Record. Slightly modified road cards are available for review upon request. Road cards for the Selected Alternative are published with the Record of Decision.

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APPENDIX D

SITE-SPECIFIC MITIGATION MEASURES INCORPORATED INTO UNIT AND ROAD DESIGN



Appendix D

Site-Specific Mitigation Measures Incorporated Into Unit and Road Design

The specific mitigation measures that are applied to selected units and/or roads are identified in this section. Listed below is a summary of the Forest Plan Mitigation Measures. The source(s) of each general measure are listed after the measure in terms of individual Forest Plan Standards and Guidelines (see Chapter 4 of the Forest Plan) or Best Management Practices (BMPs) (see Appendix C of the Forest Plan and Chapter 10 of FSH 2509.22, Region Soil and Water Conservation Handbook). Summary tables (D-1 and D-2) located at the end of this appendix show the units and roads to which the specific measures apply.

Fish, Water, and Soils

F1 Riparian Buffers: Establish no-harvest and selective cut buffers along streams and around lakes to protect riparian areas as defined by the Riparian Standards and Guidelines. Protect buffers from adjacent harvest activities (e.g., directional felling, split yarding, suspension requirements). (RIP2, BMP 12.6)

F2 Directional Felling along Buffers: Trees identified for harvest will be felled to avoid riparian areas designated for “no commercial harvest” and stream courses. (RIP2-II)

F3 Class III/IV Stream Protection: Split yard and directionally fall trees away from Class IV streams without buffers. (RIP2-II)

F8 Siting of Road-Stream Crossings: Modify the location of road-stream crossings to correspond with stable stream reaches. (TRAN214-II)

F9 Routing of Roads near Streams: Modify road routes to avoid locations near fish-bearing streams. (TRAN214-II)

F10 Routing of Roads through Wetlands and Other Sensitive Areas: Modify location of Forest Development Roads to minimize impact to wetlands, floodplains, estuaries, and tidal meadows. (TRAN214-III)

F11 Harvesting Timber in/near Wetlands and Floodplains: Modify unit design or logging system to avoid or minimize damage to muskegs, other wetlands, or floodplains. (S&W112-I, BMP 12.4 and 12.5)

Appendix D

F14 Avoid Harvesting High Hazard Soils: Modify unit design to avoid very high mass movement areas, including slopes greater than 72 percent. (S&W112-I, BMP 13.5)

F15 Avoid Road Development on Very High Hazard Soils: Avoid road construction along unstable slopes, including slopes greater than 67 percent. (S&W112-1 and BMP 13.5)

Timber

T1 Maintain Advanced Regeneration: Maintain advanced regeneration within the units to meet reforestation needs and stand objectives. (TIM111-2-I)

Wildlife and Threatened/Endangered/Sensitive Species

W1 Provide Habitat Diversity by Using the Clearcutting with Reserves System: Provide for greater habitat diversity on a stand level over time by using clearcutting with reserve trees (even-aged system) as a harvest prescription (see Appendix G to Forest Plan FEIS). (WILD112 - III)

W6 Provide Habitat Diversity by Using the Uneven-age Harvest System: Provide for greater habitat diversity on a stand level over time by using the selection method (uneven-age system) as a harvest prescription (see Appendix G to Forest Plan FEIS). (WILD112 - III)

W7 Leaving Nonmerchantable Trees and Snags: Provide for greater habitat diversity on a stand level over time by leaving most nonmerchantable trees and snags after harvest. (WILD112 - III)

W9 Road Closures: Close roads to motorized use to protect wolves and other species from over harvest. (WILD112)

W13 Protection of Bald Eagle Nest Trees/Other Sites and Timing of Activities: Avoid all activity, modify unit or road design, and/or limit timing of activities, near bald eagle nest trees, perch trees, and winter roost sites in accordance with the Interagency Agreement established with the US Fish and Wildlife Service (USFWS). (WILD112-V)

W23 Buffers along Brown Bear Streams: Establish forested buffers, where available, of approximately 500 feet along streams, where additional protective measures are needed to provide cover for brown bears while feeding. (WILD112-VI)

Recreation and Tourism

R1 Access Restrictions for Recreation: Close or restrict access on roads to maintain remoteness of areas after harvest. (REC112-II)

Scenery

V1 Meet Visual Resource Objectives by Using the Clearcutting with Reserves System: Reduce visual contrast with adjacent areas by using clearcutting with reserve trees (even-aged system) as a harvest prescription (see Appendix G to Forest Plan FEIS). (VIS11 - III)

V5 Patch/Strip Clearcutting: Reduce visual contrast with adjacent areas by using patch or strip clearcutting (two-age or uneven-age systems) as a harvest prescription (see Appendix G to Forest Plan FEIS). (VIS11-III)

V6 Meet Visual Resource Objectives by Using the Uneven-age Harvest System: Reduce visual contrast with adjacent areas by using the selection method (uneven-age system) as a harvest prescription (see Appendix G to Forest Plan FEIS). (VIS11 - III)

V7 Leaving Nonmerchantable Trees: Reduce visual contrast with adjacent areas by leaving most nonmerchantable trees after harvest. (VIS11 - III)

V8 Modification of Unit Boundaries: Modify unit boundaries to ensure that the harvest unit meets the proposed VQO in partial retention and retention areas. (VIS11-II)

Appendix D

Table D-1. Site-specific Mitigation Measures Applied to Individual Harvest Units by Alternative

Units ^{2/}	Alternative					Site-specific Mitigation Measures for Harvest Units ^{1/}																	
						Fish, Water, & Soils							Tim-ber	Wildlife & TES Species					Scenery				
	2	3	4	5	6	F1	F2	F3	F10	F11	F14	F15	T1	W1	W6	W7	W13	W23	V1	V5	V6	V7	V8
HS5	x					x	x	x			x		x		x	x		x		x	x	x	
HS5		x				x	x	x					x		x	x		x		x	x	x	
HS5				x		x	x	x			x		x		x	x		x			x		
HS7	x					x	x	x			x		x		x	x		x		x	x	x	
HS7		x				x	x	x					x		x	x		x		x	x	x	
HS7				x		x	x	x					x		x	x		x			x	x	
HS8	x					x	x	x	x	x	x		x	x		x			x			x	
HS8				x		x	x	x			x		x		x	x					x	x	
HS9	x		x			x	x	x					x	x		x	x		x			x	
HS10	x	x	x			x	x	x	x	x			x			x			x			x	
HS10				x		x	x	x					x		x	x					x	x	
H11	x	x				x	x	x			x		x			x			x			x	
H11				x		x	x	x			x		x		x	x					x	x	
H12	x					x	x	x			x		x		x	x				x	x	x	
H12		x				x	x	x			x		x		x	x				x	x	x	
H13	x					x	x	x					x		x	x					x	x	
H14	x	x		x		x							x		x	x				x	x	x	
H15	x					x	x				x		x			x			x			x	
H15		x			x	x					x		x	x		x			x			x	
H15				x							x		x		x	x					x	x	
H16	x	x			x	x	x	x			x		x	x		x			x			x	
H16				x									x		x	x					x	x	
H17	x					x	x	x			x		x	x		x			x			x	
H17		x				x	x	x			x		x		x	x					x	x	
H17				x		x	x	x					x		x	x					x	x	
H18	x					x	x	x	x		x		x	x		x			x			x	
H18		x	x			x	x	x	x		x		x	x		x			x			x	
H19	x	x				x	x	x	x		x	x	x	x		x			x			x	
H19				x		x	x	x			x	x	x		x	x					x	x	

Appendix D

Table D-1. Site-specific Mitigation Measures Applied to Individual Harvest Units by Alternative
(Continued)

Units ^{2/}	Alternative					Site-specific Mitigation Measures for Harvest Units ^{1/}																	
						Fish, Water, & Soils							Tim- ber	Wildlife & TES Species					Scenery				
	2	3	4	5	6	F1	F2	F3	F10	F11	F14	F15	T1	W1	W6	W7	W13	W23	V1	V5	V6	V7	V8
H24	x	x	x			x	x	x	x				x	x		x			x			x	
H24				x		x	x	x					x		x	x					x	x	
H25	x					x	x	x			x		x	x		x			x			x	x
H25		x				x	x	x					x	x		x			x			x	
H25			x			x	x	x					x	x		x			x			x	
H25				x		x							x		x	x							
H26	x					x	x	x	x		x		x	x		x			x			x	x
H26		x				x	x	x	x		x		x	x		x			x			x	x
H26			x			x					x	x	x	x		x			x			x	
H27	x						x	x			x		x			x	x						
H27			x				x	x			x		x			x	x						
H29	x	x	x		x	x	x	x			x		x	x		x			x			x	
H29				x		x	x	x					x		x	x							
H31	x		x								x		x	x		x	x						
H32	x	x	x		x	x	x	x			x		x	x		x							
H32				x		x	x	x					x	x	x	x							
H33			x								x		x			x	x		x			x	
S35	x	x	x				x	x			x		x			x			x			x	
S36	x	x	x				x	x	x				x	x		x							
S37				x						x			x		x	x					x	x	
S38	x	x	x			x	x	x			x		x			x							
S38				x		x	x	x			x		x		x	x							
S39	x					x	x	x			x		x		x	x					x	x	
S39		x				x	x	x			x		x		x	x					x	x	x
S40		x				x	x	x		x	x		x	x		x			x			x	
S40				x			x	x		x	x		x		x	x					x	x	
S41			x				x	x			x		x		x	x	x				x	x	
S42		x				x	x				x		x		x	x					x	x	
S42				x		x	x				x		x		x	x					x	x	

Appendix D

Table D-1. Site-specific Mitigation Measures Applied to Individual Harvest Units by Alternative
(Continued)

Units ^{2/}	Alternative					Site-specific Mitigation Measures for Harvest Units ^{1/}																	
						Fish, Water, & Soils							Timber	Wildlife & TES Species					Scenery				
	2	3	4	5	6	F1	F2	F3	F10	F11	F14	F15	T1	W1	W6	W7	W13	W23	V1	V5	V6	V7	V8
S43			X			X	X	X			X		X	X		X			X			X	
S43				X		X	X	X					X		X	X					X	X	
S44				X							X		X		X	X							
S46			X			X	X	X			X		X	X		X							
S47			X			X	X	X			X		X		X	X	X						
S49			X							X			X	X		X			X			X	
S49				X						X			X		X	X					X	X	

1/ These mitigation measures include changes and mitigation measures that were implemented throughout the unit design process.
2/ Units that have more than one prescription (i.e., different prescriptions for the various alternatives) are listed twice so that the mitigation measures can be distinguished based on the different alternatives.

Table D-2. Site-specific Mitigation Measures Applied to Individual Roads by Alternative

						Site-Specific Mitigation Measures for Roads				
						Fish, Water, & Soils			Wildlife	Recreation
	2	3	4	5	6	F8	F9	F10	W9	R1
8550150	X	X							X	X
85532-100	X	X				X	X		X	X
855399	X	X						X	X	X
8561-100	X	X				X		X	X	X
8563-400	X					X			X	X

APPENDIX E

RESPONSE TO PUBLIC COMMENTS ON THE DEIS

Appendix E

Response to Public Comments on the DEIS

Introduction

Appendix E includes all written and oral comments received for the Couverden Draft Environmental Statement (DEIS) and the Forest Service's response to the issues addressed in the public comments. The Forest Service received 71 written comments in addition to oral comments received at the ANILCA subsistence hearings (see below). The Interdisciplinary Team thoroughly and objectively read and analyzed every substantive issue and concern. Comments within each letter were numbered individually to facilitate analysis and response.

The public comment process is not a forum for voting or a survey process intended to determine public opinion. The emphasis of the review process is on the content of the comment, rather than on the number of times a comment was received. When those commenting do not see their view reflected in the final decision, they should not conclude that their comments were ignored. All comments are considered, including comments that support or oppose the proposed action. The Forest Service responses discuss how the issue has been addressed in the EIS, provide an overview of Forest Service policy or direction regarding the issue, and/or direct the reader to the appropriate section of the Forest Plan for a more complete discussion.

Comment Summary

Approximately 16 commentors expressed their opposition to timber harvest in the project area; others expressed their opposition to any federal timber harvest. Financial loss and waste of taxpayers' money were identified as a major concern associated with timber harvest (23 commentors), as were visual/scenic impacts, recreational opportunities and the impact of the loss of these resources on tourism (17 commentors). Concern over adverse impacts to wildlife and fish habitat and disturbance from logging activities to wildlife and fish (9 commentors) were also issues raised. Site-specific mitigation measures identified in the Forest Plan Standards and Guidelines (Chapter 4 of the Forest Plan) and Best Management Practices (Appendix C of the Forest Plan and Chapter 10 of FSH.2509.22, Region Soil and Water Conservation Handbook) would be applied to protect these resources. Refer to the analysis in Chapter 3 and to the ROD and individual unit and road cards attached to the ROD. Conversely, four commentors supported timber harvest in the project area, stating logging did not harm other resources and provided wood products people needed. Creation of local

Appendix E

jobs was identified as a benefit associated with timber harvest by these commentors.

Approximately 30 commentors expressed support for Alternative 5. They stressed that small timber sale opportunities were needed for local operators in Gustavus. Many expressed the view that the government should provide approximately 100,000 board feet of timber per year in perpetuity solely for Gustavus residents. While Alternative 5 does consider providing between 100,000 and 500,000 board feet of timber per year that could be purchased by small operators in Gustavus, it does not exclude people from other nearby communities, such as Hoonah, from purchasing these small sales. The Forest cannot include harvesting a given volume per year “in perpetuity.” This proposal seeks to meet direction in the current Forest Plan, which includes harvesting timber from a portion of the project area (the Timber Management and Scenic Viewshed LUDs, refer to Figure 1-2). The current Forest Plan will be revised within the next 10 years. The Forest Service has no way of knowing if the Couverden area will include LUDs that permit timber harvest or what standards and guidelines may apply over the next 100 years, or even during the next planning period. Standards and guidelines have changed significantly over the past 20 years and may continue to change as new scientific information is gained. Refer to the ROD for a discussion of the small sale issue.

Ten people commented that the Forest has changed its public involvement process for timber sale EISs, substituting informal public meetings and written comment for the public hearings that were required in the past. Many of these commentors stated that public hearings were the best way for the public to comment on proposed projects. The Forest has not changed its policy on how it seeks public comment. Holding formal hearings has not been a requirement for National Environmental Policy Act (NEPA) documents. Public meetings can follow, and have followed, various formats. For example, informal information workshops have been held for many EISs over the past several years to allow members of the public to ask specific questions and gather general information about the projects. We do not agree that public hearings are needed to allow the public to express comments for the record. We believe that written comments provide a better format for gathering public input. There is no chance that the person commenting will be misquoted. Their exact words are published in the FEIS along with the agency response. The open house format offers a chance for all participants to review information and ask questions about the project. This enables each person to spend however much time they wish providing comments, rather than restricting each person to a brief time period in a hearing. Formal hearings were held in Hoonah and Gustavus for subsistence, as required under Alaska National Interest Lands Conservation Act (ANILCA).

Four people commented that they opposed any new road construction, two people requested that all roads be closed after the project is completed and two commented that all roads should remain open. Alternatives 1 and 5 do not include any new road construction. The other alternatives include varying amounts of temporary and/or classified road construction. Refer to the Record of Decision (ROD) for a resolution of these issues.

Letters Received from Individuals, Organizations, and Agencies

The following list includes all individuals, organizations, and agencies that the Forest Service received written comments from during the 45-day comment period for the Couverden Draft EIS.

First Name	Last Name	City	State	Organization	Page
John C.	Leeds	Juneau	AK	Department of the Army, US Army Engineer District	E-5
Pamela	Bergmann	Anchorage	AK	US Department of Interior	E-8
Judith	Leckrone Lee	Seattle	WA	Environmental Protection Agency	E-13
Kevin J.	Hanley			State of Alaska Department of Environmental Conservation	E-18
Susan	Andrews				E-22
Bruce H.	Baker	Auke Bay	AK		E-24
Paul	Barnes	Gustavus	AK	Gustavus Citizens Alternative	E-26
Anissa	Berry	Port Alexander	AK		E-32
Paul	Berry	Gustavus	AK		E-34
Nathan	Borson	Gustavus	AK		E-36
Corrie	Bosman	Sitka	AK	Center for Biological Diversity	E-40
Judy	Brakel	Gustavus	AK	Gustavus Public Meeting	E-42
Tim	Bristol				E-54
Terry	Brock	Cambridge	IL		E-56
William	Brown	Gustavus	AK		E-58
Murray	Buthen	Juneau	AK		E-60
Jai	Crapella	Douglas	AK		E-64
Bob	Deering	Juneau	AK		E-66
Larry	DePute	Juneau	AK		E-68
Larry	DePute	Juneau	AK	Family Practice Physicians	E-70
Larry	Edwards	Sitka	AK		E-74
Larry	Edwards	Sitka	AK	Greenpeace	E-76
Carolyn	Elder	Gustavus	AK		E-84
Page	Else	Sitka	AK	Sitka Conservation Society	E-86
John E.	Erickson	Hoonah	AK	Tok River Outfitters	E-88
Christine	Gabriele				E-92
Owen	Graham	Ketchikan	AK	Alaska Forest Association	E-94
Melanie	Heacox	Gustavus	AK		E-96
Kevin	Hood	Juneau	AK		E-98
Thomas	Imboden	Gustavus	AK		E-100
Glen	Ith	Petersburg	AK		E-102
Catherine	Johnson	Juneau	AK		E-108
Jason	Jones	Skagway	AK		E-110
Mark	Kaelke	Juneau	AK	Bear Creek Outfitters	E-112
Christine	Kent	Juneau	AK		E-114

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First Name	Last Name	City	State	Organization	Page
Margaret	Leibowitz				E-116
Tania	Lewis	Gustavus	AK		E-118
Buck	Lindekugel	Juneau	AK	Southeast Alaska Conservation Council	E-122
Steve	Little	Gustavus	AK	Little Wood Products	E-161
Cliff	Lobaugh	Juneau	AK		E-165
Tom	Meyer	Juneau	AK		E-168
Lynn	Morrow				E-170
Richard T.	Myren	Juneau	AK	Institute of Northern Forestry, US Department of Agriculture	E-172
Dean	Nielson	Hoonah	AK		E-191
Abby Louise	Norman				E-194
Jenny	Pursell	Juneau	AK		E-196
Peggy	Redford	Gustavus	AK		E-198
Jim	Rehfeldt	Juneau	AK		E-200
Charlie	Rice	Gustavus	AK		E-202
Philip C.	Riddle			Bear's Nest B&B	E-206
Heidi	Robichaud	Gustavus	AK		E-208
Mark	Rorick	Juneau	AK	The Sierra Club	E-210
Vince	Schafer	Gustavus	AK		E-232
Gabriel	Scott	Cordova	AK	Cascadia Wildlands Project	E-234
Ellie	Sharman	Gustatus	AK		E-246
Clarence K.	Skaflestad	Hoonah	AK		E-250
Faggen	Skaflestad	Hoonah	AK		E-252
Greg	Streveler	Gustavus	AK	Gustavus Community Association	E-254
Eric	Syrene	Gustavus	AK		E-256
Todd	Thingvall	Juneau	AK		E-259
Rachel	Thomas	Huachuca City	AZ		E-262
Michael	Tobin	Juneau	AK		E-264
William R.	Tonsgard	Juneau	AK	Channel Construction Inc.	E-266
Michael F.	Turek	Juneau	AK		E-268
John	Unzicker				E-270
Randall H.	Wiest	Homer	AK		E-272
Elizabeth	Wilson	Haines	AK		E-274
Karen, Jeff & Hannah	Wilson	Juneau	AK		E-276
Robert E.	Wolf	St. Leonard	MD	Society of American Foresters	E-278
Ronald	Wolfe	Juneau	AK	Sealaska Corporation	E-315
George	Woodury	Wrangell	AK	Alaska Forest Association	E-318
Frank T.	Wright	Hoonah	AK	Hoonah Indian Association	E-320
Ann	Yates	Gustavus	AK		E-326
ANILCA Subsistence Hearings					E-329



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
JUNEAU REGULATORY FIELD OFFICE
JORDAN CREEK CENTER
8800 GLACIER HIGHWAY, SUITE 106B
JUNEAU, ALASKA 99801-8079

February 10, 2004

Regulatory Branch
East Section
POA-2004-202 (JCL)

Mr. Dave Carr
Project Team Leader
U.S. Forest Service
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801-8041

Dear Mr. Carr:

The United States (U.S.) Army Corps of Engineers, Alaska District (Corps) is providing this letter as written comment on the Environmental Assessment (EA) for the proposed Boundary Timber Sale, submitted on December 2, 2003 [received in our office 09 FEB 2004, two months later!]. The proposed project area would be located in the South Chilkat Peninsula area, in the Juneau Ranger District, Alaska. The preferred alternative allows for construction of new access roads, as well as the reconstruction of existing roads, plus the use of an existing Log Transfer Facility.

The Corps' regulatory authorities are based on two laws: Section 10 of the Rivers and Harbors Act (RHA) of 1899 (33 USC 403), which prohibits the obstruction or alteration of navigable waters of the U.S. without a permit from the Corps; and Section 404 of the Clean Water Act (CWA), which prohibits the discharge of dredged or fill material into waters of the U.S., including wetlands, without a Corps' permit. Based on information provided in the EA, and available to our office, portions of the proposed work would occur in wetlands and waters and would, therefore, be within the Corps' jurisdiction.

ACOE-1

Wetlands are defined as areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands include "muskegs", swamps, marshes, bogs, and similar areas.

Section 404(f)(1)(a) of the CWA states, in part, that normal silvicultural activities for the production of forest products, which are part of an established, ongoing operation, are not subject to regulation under Section 404 of the CWA. To fall under this exemption, the activities must not result in a conversion of an area of the waters of the U.S. to a use to which it was not previously subject, whereby the flow or circulation of waters of the U.S. may be impaired or the reach of such waters reduced (see 33 Code of Federal Regulations (CFR) 323.4(b)). A conversion of a wetland to a non-wetland to bring a new area into timber production that is not currently part of an ongoing operation is a change in use of an area of waters of the U.S. that would not be exempt from Section 404 requirements.

ACOE-2

The construction or maintenance of forest roads used for the sole purpose of silvicultural activities is exempt from regulation under Section 404 of the CWA. Section 404(f)(1)(e) of the CWA states that the construction or maintenance of forest roads for silviculture activities is exempt from

regulations under Section 404 of the CWA, provided the roads are constructed and maintained in accordance with Best Management Practices (BMP), which shall include the baseline provisions (BPs) listed in 33 CFR 323.4(a)(6). The use of BMPs assure that flow and circulation patterns and chemical and biological characteristics of waters of the U.S. are not impaired; that the reach of the waters of the U.S. is not reduced; and that any adverse effect on the aquatic environment is otherwise minimized. Please recognize that the forest road exemption applies only to roads that would be used solely for normal silvicultural activities, such as harvesting of trees. Forest roads that would remain open and that would provide more than incidental use for subsistence or recreational access, or other public use, would not be considered sole purpose roads and would not be exempt from Section 404 requirements. The Corps has the responsibility to assure that activities performed under the exemption meet the conditions included in the CWA, implementing regulations, BMPs and subsequent National guidance.

ACOE-2
cont

It appears, from the review of the EA, that all temporary roads used to support these harvests will be closed after the harvest is completed. To comply with BP No. 15, all temporary roads within the project area need to be obliterated (closed) or put into "storage". Drainage structures associated with roads that cross wetlands and streams also need to be designed to ensure that surface and subsurface flows are not restricted to comply with 404(f) BPs for forest roads.

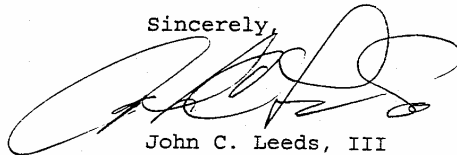
ACOE-3

Any road proposed to remain open may not be considered a single purpose road and might require CWA authorization if constructed in waters of the U.S., including wetlands. Authorization for proposals to discharge fill material in waters of the U.S. are available only for projects that clearly demonstrate compliance with the U.S. Environmental Protection Agency (EPA) Section 404(b)(1) Guidelines (40 CFR 230). The guidelines state that no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge, which would have less adverse impact on the aquatic ecosystem, as long as the alternative does not have other significant adverse environmental consequences. In those cases where the activity associated with a discharge is not water dependent, practicable alternatives are presumed to exist unless clearly demonstrated otherwise. The burden is on the applicant to provide a detailed and verifiable discussion of alternatives for our consideration. An alternative is considered practicable if it is available and capable of being accomplished after taking into consideration costs, existing technology, and logistics in light of overall project purpose.

ACOE-4

I appreciate your cooperation with the Corps' Regulatory Program. Please contact me at (907) 790-4490, or by FAX at (907) 790-4499, or by mail at the letterhead address. For additional information about our Regulatory Program, visit our web site at www.poa.usace.army.mil/reg.

Sincerely,



John C. Leeds, III
Project Manager

Response to John C. Leeds, US Army Corps of Engineers

ACOE-1: The Forest Service recognizes the Corps' regulatory authority and its definition of wetlands.

ACOE-2: The Forest Service agrees that normal silvicultural activities for the production of forest products, including roads built for the sole purpose of silvicultural activities, are not subject to regulation under Section 404 of the Clean Water Act.

ACOE-3: All alternatives include the following mitigation measures: all temporary roads will be closed and drainage structures that cross wetlands and streams will be designed to ensure that surface and subsurface flows are not restricted.

ACOE-4: All new roads would be closed following completion of the project. New roads constructed for this project would be placed in "storage" after use. Roads in storage are not considered usable by normal vehicle traffic. Placing a road in storage includes such activities as removing culverts and installing waterbars; however, the roadbed would be mostly left intact. Temporary roads constructed for this project would be obliterated. Obliteration includes stabilization and restoration measures, such as blocking the entrance to the road, installing waterbars, removing culverts, restoring vegetation, removing fill where appropriate, and re-establishing former drainage patterns.



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1689 C Street, Room 119
Anchorage, Alaska 99501-5126



ER04/119

April 2, 2004

Mr. Dave Carr
Couverden Timber Sales Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, Alaska 99801-8041

Dear Mr. Carr:

The Department of the Interior has reviewed the U.S. Forest Service's (USFS) December 2003 Draft Environmental Impact Statement (EIS) for the Couverden Timber Sales project. We believe that the following comments need to be addressed in the Final EIS.

Project Description

The Couverden sale area is located on the south Chilkat Peninsula along Icy Strait, approximately 30 air miles west of Juneau and 20 air miles southeast of Gustavus, Alaska. The USFS proposes to harvest 20 million board feet of timber from 764 acres (Alternative 3). This alternative would require construction of approximately 3.4 miles of new classified road and 1.8 miles of temporary road. Under alternatives 2, 3, and 6, the USFS proposes to close all new roads to motorized vehicles (except all-terrain vehicles). The harvested logs would be transported to an existing log transfer facility and loaded directly onto barges.

Old Growth Habitat

Old-growth reserves (OGR) provide important nesting habitat for numerous U.S. Fish and Wildlife Service (FWS)-managed trust species, including marbled murrelets, goshawks, and bald eagles. Two small OGRs are found within the project boundary. One is in Value Comparison Unit (VCU) 1170 and the other is in VCU 1180. An interagency review of these OGRs by biologists from the USFS, FWS, and the Alaska Department of Natural Resources revealed that the mapped OGR in VCU 1180 did not meet Tongass Land Management Plan (TLMP) design criteria (16 percent of the total acreage in the VCU and 50 percent of the OGR in productive old growth). This OGR was identified in TLMP as being 1,469 acres in size. The interagency group recommended that the boundary for the OGR in VCU 1180 be adjusted to extend farther up the east side of Swanson Creek at the 800-foot contour. This recommended adjustment increased the acreage to 2,258 acres or 16.4 percent of the total acreage with 72 percent of the OGR in productive old growth. This adjustment brought the small OGR in VCU 1180 into compliance with Appendix 1 of Appendix N of TLMP. We agree that adoption of this modification to the

USDI-1

Page 1 of 3

OGR will maintain the integrity of the old growth habitat reserve strategy. No modifications were recommended for the small OGR in VCU 1170 because of its current non-harvest status. We recommend that the adjustments discussed above for VCU 1180 be included in the Final EIS.

USD1-1
(cont.)

Unit Number S49, located north of road 8553 and adjacent to a small OGR, is scheduled for clearcut harvest under Alternative 4. We believe that harvest of this unit may make the adjacent standing trees in the old growth reserve vulnerable to windthrow. We recommend that this harvest unit be designated as a windthrow management unit to minimize the potential unraveling of the adjacent old growth reserve, and that the Final EIS be modified accordingly.

USD1-2

Biological Diversity

Alternative 2 proposes to build roads and harvest approximately 58 acres (6 percent) within the Chilkat-West Lynn Canal Inventoried Roadless Area (IRA). Roadless areas provide large, undisturbed landscapes that offer solitude, unique areas for recreation and subsistence, and sources of clean drinking water (Draft EIS page 3-6). This IRA supports migratory birds, mountain goats, black and brown bear, Sitka black-tailed deer, bald eagles, wolves, and moose. Streams in the IRA support runs of Dolly Varden char, steelhead and cutthroat trout (Draft EIS page 3-10). We believe that continuing to manage the IRA under current TLMP direction will best conserve biological diversity, protect the area against the spread of invasive species, provide opportunities for recreation and subsistence, and benefit FWS-managed trust species, including bald eagles and goshawks. Therefore, we recommend that timber harvest be excluded in this IRA in Alternative 2 in the Final EIS.

USD1-3

Second Growth Management

The proposed timber harvest methods for the Couverden project area are identified in the Draft EIS (Table S-1). Traditionally on the Tongass National Forest, the primary timber harvest method has been by clearcut. Clearcut logging often results in the regeneration of even-aged, overstocked stands of timber. These second growth stands eventually shade out understory vegetation that is important to many species of wildlife, including Sitka black-tailed deer, ground- and shrub-nesting passerines, and small mammals. These stands are also poor at intercepting snow, making it difficult for wildlife to forage and seek shelter beneath the canopy. Elements that studies show to be important to a variety of wildlife include multi-storied canopies; diverse understory vegetation; adequate, but not excessive, downed woody material; and large, standing snags. To avoid converting large, contiguous areas of productive forest land with high wildlife values into second-growth stands of limited value to wildlife, we encourage the evaluation and adoption of a silvicultural system that retains important elements of wildlife and fish habitat, especially in the timber units within important wildlife travel corridors (e.g., HS5, HS7, HS8, H25, and H32). Alternative harvest systems, such as shelterwood cuts, individual tree selections, or other methods are, we believe, better at maintaining wildlife travel corridor and other wildlife and fish habitat values than traditional clearcuts. We recommend expanding the discussion in the Final EIS of relative wildlife impacts resulting from the different silvicultural systems that are being considered.

USD1-4

Clearcut logging typically removes all trees in a harvest area including those that will not be salvaged for timber or pulp products. Such trees provide little or no value to operators, but can provide substantial benefits to snag-dependent wildlife (e.g., woodpeckers, brown creepers, and nuthatches). We believe that mature trees with substantial rot, twist, or other timber "defects" should be left standing where possible, rather than cut and either left onsite or discarded later. This would allow continued use of harvested areas by some snag-dependent species. We recommend this be discussed in the Final EIS.

USD-5

Queen Charlotte Goshawk

Based largely on implementation of the 1997 TLMP, FWS found that listing the Queen Charlotte goshawk under the Endangered Species Act was not warranted. The Draft EIS (page S-5) states that the project area contains habitat important to goshawks. The Draft EIS (page 3-23) also states that old growth forests provide critical nesting, foraging, rearing, denning, and cover habitat for wildlife, including the Queen Charlotte goshawk. The Threatened, Endangered, and Sensitive Species section of the Draft EIS (page 2-4) states that biological evaluations have been completed for all sensitive species potentially occupying the project area. Table 3-11, (Draft EIS page 3-33), indicates that goshawks were not observed in the project area. Goshawk surveys are required in harvest units prior to sale of those units. Nesting pairs, however, do sometimes change nest locations from year to year, and nests may be built in units in subsequent years after surveys have been conducted. We recommend that the Final EIS include a requirement that goshawk nesting surveys be done annually in all units included in the selected Alternative until those units are harvested. In addition, in the event where goshawk nesting is confirmed, we recommend the units be modified so that the appropriate TLMP standards for preserving nesting habitat can be met, or the unit be deferred or dropped. We believe implementation of the TLMP standards will help maintain foraging habitat and nesting habitat for the goshawk.

USD-6

Fisheries

The Draft EIS includes measures that would protect both the fishery resource and the public's opportunity to utilize and enjoy the resource. We recommend that these measures be carried forward to the Final EIS.

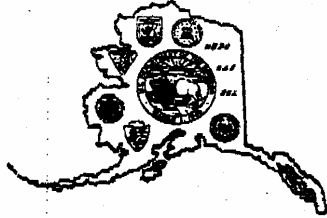
Future Coordination

We appreciate the opportunity to comment on this document. We look forward to continued dialog on this project, and request that FWS personnel be included in any meetings or fieldwork on any of the issues discussed above. If you have any questions, please contact Bruce Halstead, Field Supervisor, Juneau Fish and Wildlife Field Office, at (907) 586-7240.

Sincerely,



for Pamela Bergmann
Regional Environmental Officer - Alaska



FAX

U.S. DEPARTMENT OF THE INTERIOR
OFFICE OF THE SECRETARY
OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE
1689 C STREET, ROOM 119
ANCHORAGE, AK 99501-5126

Date: 4-2-04 Time: _____ Total pages 3
(w/o cover)

To: Couverden Timber Sales Comments
907-586-8808

From: [] Pamela Bergmann, REO [x] Douglas Mutter, REA [] Marinell Kukis, RS

NOTES:

Original letter is in the mail.

Verification # (907)271-5011
Fax # (907)271-4102

Response to Pamela Bergmann, USDI Office of Environmental Policy and Compliance

USDI-1: All action alternatives include enlarging the old-growth reserve in VCU 1180 as recommended by the Interagency Committee. As recommended by the Interagency Committee, no modifications were made to the old-growth reserve in VCU 1170 at this time.

USDI-2: Unit S49 is included in Alternative 4. It is not designated a windthrow management unit to protect the adjacent old-growth reserve under this alternative as you recommend because there is no requirement under the Forest Plan to buffer old-growth reserves. However, none of the other alternatives include this unit, including the preferred alternative.

USDI-3: Approximately 58 acres of roadless land as defined in the SEIS to the Forest Plan (including approximately 19 of which are in the mapped IRA) are recommended for harvest under Alternative 2. This represents a harvest of less than 0.003 percent of the IRA this decade. None of the other alternatives include harvest in the roadless area. The portion of the IRA considered for harvest under Alternative 2 is allocated to Timber Management under the Forest Plan. There is no regulation or policy that prohibits harvesting timber in this portion of the IRA (refer to the recent Roadless Rule decision and the SEIS to the Forest Plan).

USDI-4: Units HS5 and HS7 are proposed for single tree and group selection harvest under all alternatives in which they are included. Unit HS8 is proposed for clearcut with reserves under Alternative 2 and single tree and group selection harvest under Alternative 5. Unit H32 is proposed for single tree and group selection harvest under Alternative 5 and as clearcut with reserves under the other action alternatives.

USDI-5: We agree that mature trees with substantial rot and other defects should be preserved for their wildlife habitat value wherever they can be safely left. All unit cards for units with a clearcut with reserves prescription contain this measure as mitigation. At least 10 percent of the trees would be left in units proposed as clearcut with reserves.

USDI-6: The Forest Plan does not require goshawk surveys in every year prior to harvest, nor is it required under the TPIT clarifications. Surveys to date have not detected any goshawks in the project area.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

May 12, 2004

Reply To
Attn Of: ECO-088

Ref: 02-051-AFS

Susan Marthaller
Acting District Ranger
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

OPTIONAL FORM 98 (7-80)

FAX TRANSMITTAL

of pages 4

To <i>Dave Car</i>	From <i>Jonathan Freedman</i>
Dept./Agency <i>U.S. Forest Service - Juneau</i>	Phone # <i>206 553-0256</i>
Fax # <i>(907) 586-8808</i>	Fax # <i>206 553-6984</i>

NSN 7540-01-317-7369 5095-101 GENERAL SERVICES ADMINISTRATION

Dear Ms. Marthaller:

The U.S. Environmental Protection Agency (EPA) has reviewed the **Couverden Timber Sales** draft Environmental Impact Statement (EIS) [CEQ No. 040063] in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

EPA-1

The draft EIS examines five alternative proposals to harvest between 6 and 27 Million Board Feet (MMBF) of timber on between 172 and 978 acres within the project area of 45,500 acres on Chilkat Peninsula, just east of Icy Strait from Chichagof Island, about 30 air miles west of Juneau, Alaska. The preferred alternative, Alternative 3, proposes to harvest 20 MMBF of timber from 764 acres and extract harvested logs using existing roads, 3.4 miles of new roads, 1.8 miles of temporary roads, transporting them to an existing Log Transfer facility on the west side of Chilkat Peninsula in Icy Strait.

We have rated the EIS, EC-2 (Environmental Concerns- Insufficient Information). We are concerned about almost 30 miles of existing roads which would remain open after timber harvest, despite evidence presented in the EIS that they are present sources of sediment delivery to surface waters in the project area, impacting water quality. Our second concern is with the selection of Alternative 3 as the preferred alternative. We prefer the selection of Alternative 5, which does not propose new roads, avoids clearcutting, and reduces effects to aquatic resources. If Alternative 3 is selected, we encourage the Forest Service to consider decreasing the proposed clearcuts and increasing selection harvest.

EPA-2

This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

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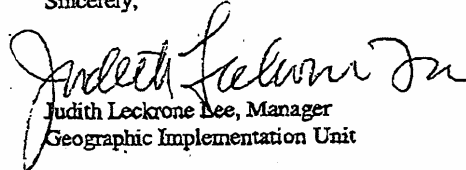
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We wish to apologize for being so late in our response to the draft EIS. We realize that our tardiness may have made preparation of the Final EIS more difficult, and we regret any inconvenience this might have caused the Forest Service. Thank you for the opportunity to review this draft EIS. If you would like to discuss this letter, please contact Jonathan Freedman at (206) 553-0266.

Sincerely,


Judith Leckrone Bee, Manager
Geographic Implementation Unit

Enclosures

cc: Kevin Hanley, ADEC
Chris Meade, EPA AOO Juneau
Dave Powers, EPA Forest Team Leader
Marcia Combs, EPA AOO Anchorage

PAGE 3/6

ID: 90755868808

MAY-13-04 12:15 FROM: JRD

**U.S. Environmental Protection Agency (EPA) Detailed Comments on the
Couverden Timber Sale Draft Environmental Impact Statement (EIS)**

Alternatives

While the preferred Alternative, Alternative 3, avoids impacts to inventoried roadless areas and reduces impacts in general by minimizing harvest volume, Alternative 5 appears to be the environmentally preferred option. It calls for the exclusive use of selective harvest in place of the extensive clearcutting of alternative 3. Selective harvest would provide improved vegetative structural diversity as harvest areas recover and decreased sediment delivery from harvest units to streams. Importantly, unlike alternative 3, it utilizes the existing road system. In avoiding the construction of new roads, it further minimizes sediment-related water quality impacts. We would prefer the selection of Alternative 5 as the preferred alternative.

EPA-3

Forest Roads and Water Quality Impacts

Forest roads are significant contributors to the degradation of the ecosystem. They negatively affect surface hydrology, water quality and aquatic habitat by delivering sediment to streams, fragmenting wildlife habitat, causing increase predation on terrestrial mammals, and reducing biodiversity.

The EIS identified a number of present project locations along roads where landslides and deterioration of stream crossing structures have occurred and presently need repair, such as those identified on Forest Roads 8553 and 8555. EPA, therefore, has particular concerns about the potential for these roads to continue to impact surface water quality in the project area. The EIS notes that there are unfunded critical maintenance needs on project area roads (page 3-187). While Forest Service does not any plans for future timber harvest in the project area, 6.9 miles of new roads would be constructed for the proposed timber harvest, and of the present total of 35.7 miles of roads open in the project area, 29.5 miles of roads would remain open. Without on-going monitoring and active maintenance, continued sedimentation to streams can be expected.

EPA-4

Given the isolation of the Couverden project area, the lack of reasonably foreseeable future timber harvest, the presently reported maintenance needs, and the overall road maintenance difficulties in the Tongass National Forest, we strongly recommend that the preferred alternative should call for closure of the project area road system, or at a minimum, closure of the areas on the existing road network where problems that pose risks to water quality currently exist.

Wetlands and Aquatic Resources

The Wetland Section of the EIS notes that wetlands in the project area are predicted to be almost 28% of the project area, or about 13,700 acres. Estimates for wetland impacts under Alternative 3 are 77 acres, with most being classified as Palustrine Forested Wetlands (PFO). Total wetland impacts under Alternative 5 would be considerably less (44 acres) than under the preferred alternative. The source for this estimate is the National Wetland Inventory (NWI) Maps, which can often underestimate wetland acreage. The EIS should disclose this possibility, and consider estimating a range of wetland acreage based on your past experience comparing NWI data with ground-truthed wetland mapping in the Juneau Ranger district.

EPA-5

The wetland section should clarify whether any identified high value wetlands, such as emergent bogs and fens, would be directly or indirectly impacted if the proposed action were implemented, either temporarily by timber harvest or over the long term by road construction. We also recommend that the EIS display known wetlands areas in relation to harvest units and proposed new roads, or at a minimum, display those that meet the definition of high value wetlands (this could be done in the harvest unit cards in Appendix B).

Wildlife Habitat Fragmentation

Some harvest units, such as HS5, HS7, HS8, H25, H 32 and possibly H9, H15, and H18, appear to have greater potential for fragmenting wildlife habitat, than other harvest units, given their location in proximity to previous harvest units and existing or proposed roads. The EIS should discuss what specific locations within the project area are at the greatest risk for habitat fragmentation and increased predation.

EPA-6

Response to Judith Leckrone Lee, Environmental Protection Agency

EPA-1: The Environmental Protection Agency's responsibilities under NEPA and the Clean Water Act are noted.

EPA-2: The DEIS (pages 122-124) states that while most slides associated with past management likely contributed sediment in the past, and may continue to contribute some sediment to streams, these have had little effect on water quality. Also, most roads in the Swanson and Homeshore watersheds have been closed, and the FEIS recommends closing an additional road segment in the Homeshore watershed. The FEIS also notes that there are no developed water uses, designated campgrounds, or Forest Service recreational cabins in the project area.

EPA-3: Your preference for Alternative 5 because it minimizes harvest volume and avoids road building and clearcutting is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

EPA-4: The Forest standards and guidelines and approved best management practices mitigate adverse impacts to water quality and wildlife. Also, as stated in the FEIS, the Forest intends to repair road problems using separate funds. Any roads built for this project would be closed after harvest, as would an additional 0.8 mile of the Homeshore Road.

EPA-5: Wetlands mapped in the field are shown on unit card maps, such as the wetland shown on page B-128 or, more generally, noted on the unit card (page B-167). No effort was made to map all forested wetlands. Timber harvest and road construction near high-value wetlands (such as emergent bogs and fens) was avoided. The DEIS notes on page 3-14 that harvest would occur on less than 1 percent of wetlands in the project area.

EPA-6: Units that appear to have a greater potential for fragmentation, based on their proximity to roads and previous harvest, including units HS5, HS7, HS8, H25, and H32, are discussed in the direct and indirect effects on wildlife corridors and habitat connectivity section of the EIS.

MEMORANDUM

State of Alaska Department of Environmental Conservation

TO: Joe Donohue
Project Review Coordinator
DNR - OPMP

DATE: March 10, 2004

FILE NO: AK0402-10J

THRU:

TELEPHONE NO: 465-5364

FROM: Kevin J. Hanley
Environmental Specialist
Division of Water

SUBJECT: Couverden Timber Sale
DEIS

The Department of Environmental Conservation has reviewed the Draft Environmental Impact Statement (DEIS) for the U.S. Forest Service's proposed Couverden Timber Sale on the Chilkat Peninsula. Specifically, this project proposes to harvest between 6.4 and 27.4 MMBF of timber from approximately 172 to 978 acres, and to construct up to 4.3 miles of new classified road and 3.5 mile of temporary road, depending on alternative. Associated with this project is the use of an existing log transfer facility where logs would be loaded directly onto barges under all of the action alternatives.

The DEIS identified Alternative 3 as the Forest Service's preferred alternative for this project. This alternative proposes to harvest approximately 20 MMBF of timber from an estimated 764 acres, and would involve the construction of 3.4 miles of new classified road and 1.8 miles of temporary road. All new roads constructed for this project would be closed and placed in storage upon completion of harvest activities. We offer the following comments pursuant to 6 AAC 50 of the Alaska Coastal Management Program (ACMP) and Section 319 of the Clean Water Act (CWA). These comments collectively address ACMP, CWA Section 319, and NEPA concerns, with ACMP standards cited, where applicable.

Pursuant to 6 AAC 50 of the Alaska Coastal Management Program and 11 AAC 95 (the Forest Practices Regulations), the department concurs with the Forest Service's consistency determination for this project. Our concurrence applies only to the water quality aspects of this sale. We are able to find this project consistent based, in large part, on the level of information that was provided concerning road construction, maintenance, and closure, and the fact that no slopes greater than 72 percent would be harvested under any alternative. In addition, the proposed full implementation of the TLMP process group standards and guidelines (RIP2.III.E) along all Class I, II, and III streams within the project area provides reasonable assurance that yarding will be carried out consistent with the standards of 11 AAC 95.360(a). However, we do have several concerns and comments related to other aspects of the DEIS including: 1.) the amount of the existing road system that will remain open after completion of this timber sale, and 2.) the selection of a final alternative for the Record of Decision. These are discussed as follows:

ADEC-1

1. The Amount of Roads to Remain Open Following Completion of this Timber Sale

According to the DEIS (page 3-141), *"Currently, there are no additional timber sales scheduled in the project area or adjacent areas. The only actions expected to occur would be precommercial thinning of past harvest areas (primarily in the Homeshore Creek watershed), road maintenance, and recreational activity."* However, although the DEIS indicates that all new classified and temporary roads constructed for this timber sale will be closed upon completion of harvest activities, it also indicates (on page 3-189) that 29.5 miles of existing roads will remain open for public use. If there are no more timber sales planned in the foreseeable future, then what is the need for this amount of open roads? This is especially questionable since the DEIS (page 3-186) indicates that approximately \$18,400 of critical maintenance and \$189,000 of non-critical maintenance needs currently exist in the project area. Most notable are those that exist on the 8553 and 8555 Roads where, according to the DEIS (page 3-187), *"Improperly placed fill or road placement appears to have contributed to one landslide on Road 8553 at Milepost 2.4 and one landslide on Road 8555 at Milepost 1.9. Roads have been impacted by landslides at two other places (Road 8553 at Milepost 8.3 and Road 8555 at Milepost 3.9)."* In addition, six stream crossing structures located on Road 8553 may impede fish passage. Without ongoing monitoring and active maintenance, similar problems may occur in the future on these and other parts of the road system.

ADEC-2

Given the isolated nature of the Couverden project area, it is unrealistic to expect that the 29.5 miles of roads will be effectively monitored and maintained over the long-term. This is especially true given the high costs of mobilizing equipment for the maintenance of roads in such a remote location, and the fact that the total amount of roads on the Tongass far exceeds the annual funding available to maintain them. The deficit nature of this timber sale under all action alternatives means that it won't generate additional funds to pay for the critical and non-critical maintenance needs that currently exist in the project area. Rather than relying on the improbability of securing adequate maintenance funds in the future, the entire road system should be closed and placed in storage as part of the contract package(s) for this timber sale. This would be most efficient, as the necessary equipment would already be on-site. At the very least, Roads 8553 and 8555 should be effectively closed consistent with the standards of 11 AAC 95.320, as they currently exhibit problems that pose risks to water quality and fish habitat.

2. Recommendation for a Selected Alternative

Although all of the action alternatives appear to be consistent with the water quality-related components of the Forest Practices Act and Regulations, Alternative 5 clearly is the most environmentally preferred. Although it harvests more acres than Alternative 6, it avoids clearcutting altogether and utilizes selective harvest prescriptions (diameter limit and group selection). Such prescriptions would more effectively ensure that slope stability will be maintained, and would also provide a greater degree of structural diversity than would the large amount of clearcutting that is proposed under the other action alternatives. In addition, Alternative 5 utilizes the existing road system and does not construct any new roads. Other positive aspects of this alternative include the fact that it would provide the greatest opportunity for small sales to local operators (seeks to make 100 MBF to 500 MBF

ADEC-3

Joe Donohue

3

March 10, 2004

of timber available to local operators each year for ten years), and it is the second least deficit (-\$1,035,840) of all the action alternatives (Alternative 6 is the least deficit at -\$254,720). Consequently, we highly recommend that it be selected as the final alternative for the Record of Decision for this project.

ADEC-3
Cont.

We appreciate the opportunity to comment.

cc: Chris Foley, ADEC
Moirra Ingle, DNR/OHMP
Al Ott, DNR/OHMP
Richard Enriquez, USFWS
Chris Meade, USEPA
Dave Carr, USFS
Susan Marthaller, USFS

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Response to Kevin J. Hanley, State of Alaska, Department of Environmental Conservation

ADEC-1: We are pleased that the Alaska Department of Environmental Conservation concurs that the project is consistent with the Alaska Coastal Management Program for water quality aspects of the sale.

ADEC-2: Nearly all of road 8555 and almost a mile of road 8550 is recommended for closure. The remainder of the existing road system is expected to remain open. It is used for recreation and administration. As stated in the DEIS, the Forest Service plans to pay for maintenance costs using funds appropriated by Congress for road maintenance.

ADEC-3: Your comments supporting Alternative 5 are noted.

I have interest in a cabin on Homeshore and do not want any more logging
to take place on Couverden. Susan Andrews

SA-1

Response to Susan Andrews

SA-1: Any timber harvest would occur in areas allocated for timber harvest under the Forest Plan, refer to Chapter 1 of the FEIS for a description of these areas. Refer to Appendix A for a discussion of why timber harvest is being planned in the Couverden area at this time.

Fax : 907-789-9354

Mar 06 13:04

Bruce H. Baker

P.O. Box 211384

Auke Bay, AK 99821-1384

Phone: (907) 789-9354

March 29, 2004

Forrest Cole, Forest Supervisor
Couverden Timber Sales Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801

FAX: (907) 586-8808

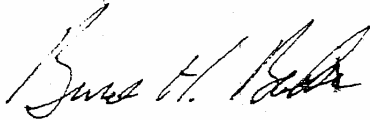
Subject: DSEIS for Couverden Timber Sales

Dear Mr. Cole -

I urge you to adopt the Citizen's Alternative for the Pt. Couverden timber sales that you have proposed. My substantive reasons include the following:

1. Your proposed action would result in a strong bias toward forest liquidation at the expense of other wildland and wildlife values.
2. Your proposed action represents a financial loss to American taxpayers.

Sincerely,



BHB-1

BHB-2

BHB-3

Response to Bruce H. Baker

BHB-1: Your support for the “Citizen’s Alternative” is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

BHB-2: None of the alternatives would result in “forest liquidation.” Past and proposed harvests are below the harvest level that is sustainable for the suitable land in the project area. The Timber Resource Report includes an analysis of even-flow, long-term sustained yield for the project area. It includes previous and proposed harvest. The analysis concludes that a sustainable harvest of 9 percent of the suitable volume per decade is sustainable. The base year was 1979; the year the first harvest occurred. Approximately 342 MMBF existed prior to harvest on land currently considered suitable. Approximately 46.2 MMBF has been harvested from these suitable areas. This is less than 9 percent per decade. Alternative 2 has the highest proposed harvest volume, 27.4 MMBF. This is less than 9 percent. The analysis assumes a 100-year rotation for the Timber Management LUD and a 170-year rotation for the Scenic Viewshed LUD. This analysis did not include thinning volume that may be harvested from second growth stands in the future. This information has been added to the FEIS.

BHB-3: A timber sale would only be sold if timber values were to rise to the point that the sale would be economical, as noted in the EIS.

DEAR FOREST SERVICE,

24 MAR 04 Paul Barnes

ENCLOSED ARE OUR COMMENTS FOR THE PROPOSED COUVERDEN
TIMBER SALE. THE COMMENTS REPRESENT THE GUSTAVUS CITIZENS ALTERNATIVE,
WHICH IN THE COUVERDEN DEIS IS ALTERNATIVE 5, ROUGHLY, THE ENCLOSED
COMMENTS ATTEMPT TO POINT OUT SOME OF THE DIFFERENCES. WE'RE Hoping
OUR ALTERNATIVE ACTUALLY RECEIVES SOME HOPEFUL ATTENTION SINCE IT ENJOYS
GUSTAVUS-WIDE SUPPORT & IT'S THE ONLY ALTERNATIVE; OTHER THAN THE
NO ACTION ALTERNATIVE, THAT HAS ~~POTENTIAL~~ POTENTIAL BIDDERS. IT IS ALSO
THE ONLY ALTERNATIVE THAT, IN OUR OPINION, MAKES ECONOMIC & ECOLOGICAL
SENSE & ATTEMPTS TO DO SO IN PERPETUITY. PEOPLE IN GUSTAVUS ARE
EXCITED ABOUT THE POSSIBILITY OF ~~OUR~~ OUR ALTERNATIVE HAVING A CHANCE.
IF DONE RIGHT, IT COULD BE A BENEFIT TO THE ICY STRAIT AREA FOR YEARS TO
COME. PLEASE CONTACT ME IF YOU HAVE ANY QUESTIONS. THANK YOU.

PB-1

PAUL BARNES
Box 155
GUSTAVUS, AK 99826

RECEIVED

MAR 26 2004

JAMES R. BERRY
AL 1001

GUSTAVUS CITIZENS ALTERNATIVE
(USFS ALY 5)

The Local Alternative for Timber Management at Couverden
March 20, 2004

INTRODUCTION

When the Forest Service began planning for a new round of timber sales in 2002, several Gustavus residents assembled the following proposal with the help of the Juneau Ranger District staff. An incomplete sketch of this proposal was included by the Forest Service as Alternative 5 in their Draft Impact Statement issued in December, 2003.

The basic premise of this alternative is that Couverden is the last chance to get timber management right on public lands in the Icy Strait region. A look at the map shows that only the eastern end of the region is open for logging. Of that, the Forest Service and Native corporations have scalped NE Chichagof. Gustavus timber is too young to be very valuable, and is mostly privately owned in small parcels. Couverden is the remaining large block of old-growth timber. The Forest Service is off to a bad start here also, allowing two poorly conceived sales that have taken a big bite out of the timber base. However, there is a lot of timber left, and a useful road system, yard and transfer facility is in place. The main thing now is to see that in the present round of planning, the Forest Service doesn't continue to clearcut away our future options and sell them for a song to exporters.

PB-2

The local alternative is an attempt to make ecological and economic sense of timber management at Couverden that factors in the needs and opportunities for our region.

OBJECTIVES

These are the beginning assumptions we used to put the alternative together:

- Harvest sustainably, in perpetuity
- Build no new roads outside the presently roaded area
- Design sales to maximize their utility to local timber operators
- Use a rotation length that regenerates high quality timber
- Protect key wildlife habitat
- Use harvest methods that mimic nature
- Protect aesthetic qualities
- Have a special management program for yellow cedar

PLAN DETAILS

Available Timber

We began by getting data on timber volumes and acreages in the roaded area, as defined on Forest Service planning maps. This took some work and extrapolations, as they only had firm data for the pool of possible cutting units, which make up only about 15% of the total roaded area. The method for working out the extrapolations is given in Appendix I. We concluded:

- 1) after removing acreage from the timber base for inoperability, key fish & wildlife habitat, and previous clearcutting, about 40% of the total roaded area should still be available for harvest;

- 2) being very conservative, at least 100 million board feet (MMBF) of timber remained available on this acreage.

Rotation Length

After looking at a lot of stumps and live trees at Couverden, it is clear that it takes at least 200 years to grow a high quality tree there. That is also the minimum time it takes to restore a logged area to full value wildlife habitat. So we took this as our suggested MINIMUM rotation length.

Allowable Cut

Dividing 100 MMBF by 200 gives us an annual maximum allowable cut of 0.5MMBF. After talking to local timber operators, it is clear that this is also about the maximum they can handle, even if they join forces to do it.

Sale Configuration

The Forest Service would prefer to sell the timber off in big chunks, which has three problems for locals: sales are too big for local mills; they don't provide an even flow of timber; and there is no guarantee of sustainability. A key part of our plan is to offer sales that provide an even flow of timber at the maximum rate of 0.5MMBF/year, which according to our calculations can be done in perpetuity.

* IN FACT, IT
GUARANTEES NO
LONG-TERM FUTURE
PRODUCTION WOOD FROM
PRODUCTS FOR THE COUVERDEN
AREA.

Harvest Method

The goal is to mimic natural forest conditions. Gustavus has a long history of opposing clearcutting, because we know it to be ecologically damaging and aesthetically unacceptable. Our alternative envisions only selection cutting and small cut patches staying smaller than four acres. Individual good trees can be harvested, but in general we want to avoid high-grading so that a supply of the best trees is always available to sawyers and wildlife.

Cedar Management

This beautiful and valuable tree is scarce in the region, and has been mercilessly scalped off of NE Chichagof, where it is most common. Less than 1% of Couverden timber is cedar. Our plan envisions very careful harvest and efforts to encourage establishment of new individuals to replace the ones cut.

Appendix I TIMBER CALCULATIONS

We want to design an alternative that allows a small annual cut that can be sustained in perpetuity on timber that can be accessed from the existing permanent road system with a minimum of temporary roading. So the first thing we need to know is, what is the timber base within the area accessible from that road system.

If we take as a first approximation of this roaded area* the USFS depiction of it as shown on their recent maps, and use figures provided by the JRD's McCoy on 9/5/02, we can do a first approximation of the timber base, as follows.

The USFS figures show that the aggregate area of their initially proposed cutting unit pool is 1718 acres. I suggest that we delete the portion of cutting unit HS 2 along Homeshore Creek in the roaded area because of its high habitat value (96 acres). This further reduces the area in the cutting unit pool to $1718 - 96 = 1622$ acres.

To estimate the timber base in this unit pool, we have to do a little math. The FS gives the amount of timber in the unit pool as 50.8 million board feet (MMBF). Multiplying this number by the ratio of the original unit pool acreage to the reduced one ($1622/1718$) gives us a figure of 48 MMBF.

The next step is to make an estimate of the timber base in the portion of the roaded area we think could be logged over time. To do this, we have to make some estimates and assumptions. By visual inspection of the FS maps, I estimate that 30% of the roaded area was logged in previous sales. This is obviously not available for harvest in this rotation, and should be removed from the calculation. I also estimate visually that an additional 15% of the roaded area does not have commercial quality timber on it &/or is too steep to be operable, and should be removed also. Finally, I suggest we remove another 15% for old growth, riparian &/or habitat retention. Thus in aggregate, we've removed 60% of the total roaded area from further consideration, leaving 40% that will be managed for timber production.

I further estimate by visual inspection of the maps that the cutting unit pool proposed for this sale makes up about 15% of the roaded area, which works out to 38% of the remaining 40% containing timber we agree to cut. To obtain a crude approximation of how much timber is available on the 40%, we would divide the figure of 48 MMBF by .38, which gives us approximately 126 MMBF**. Since this is a very crude estimate based on several uncertainties, let's be conservative and reduce it to **100 MMBF**.

With this estimate in hand we are now in a position to calculate how large a cut is sustainable over, say, a 200 year rotation. $100 \text{ MMBF} / 200 \text{ yr} = .5 \text{ MMBF/yr allowable average annual harvest***}$.

Notes:

- *- This area is a generalization and includes more acreage than what is strictly roaded.
- ** - Making the further assumption that the unit pool is representative of the larger area.
- *** - For subsequent rotations, the 30% of the roaded area removed from the first rotation calculation will be back in the equation. This addition will have the effect of further hedging our bets as we approach the end of the first 200 year rotation.

Response to Paul Barns

PB-1: Your contribution in developing Alternative 5 and your support for that alternative is noted.

PB-2: We feel that Alternative 5 is a reasonable approximation of the community proposal. Though Alternative 5 is more flexible in that it allows for higher, but still small, sale offerings in some years, it still meets the needs of all local communities. Please note that the DEIS erred in stating the proposed volume for Alternative 5. It proposes a total sale volume of 100 to 500 MBF per year but then assumes a total volume over the decade of 8 MMBF of timber. This should have been 1 to 5 MMBF, not 8. This has been corrected in the FEIS, along with all numbers derived from using this figure.

The following eight objectives of the community proposal listed in your comment letter are discussed below:

1. Harvest sustainably: All proposed alternatives, including Alternative 5, are sustainable. Alternative 5 proposes to harvest 1 to 5 MMBF in the coming decade. The Forest cannot commit to a sale program that extends beyond that period because, under current law, a new Forest Plan will be developed every 10 to 15 years. The current Plan was approved in 1997. We have no way of knowing the standards and guidelines or land allocations that may exist in the future.
2. Build no new roads outside the presently roaded area: Alternative 5 would not build any new roads.
3. Design sales to maximize their utility to local timber operators: Sales from 100 to 500 MBF per year would be designed and offered under this Alternative 5. Sales of this size would be reasonable for local operators. Please bear in mind that Gustavus is not the only local community that is interested. Local operators in Hoonah, which is 13 miles to the south, are also interested.
4. Use a rotation length that regenerates high quality timber: Alternative 5 only includes selective logging. Rotation age is not applicable under an uneven aged system. Rotation age refers to the age of the stand at final harvest (regeneration harvest). There would not be a regeneration harvest under an uneven aged system.
5. Protect key wildlife habitat: Alternative 5 protects key habitat, as do the other action alternatives.
6. Use harvest methods that mimic nature: Alternative 5 proposes selective harvest. To the extent that any harvest can mimic nature, it is likely that selective harvest would. However, no harvest system truly mimics natural events in Southeast Alaska because trees are removed from the site, which seldom happens in nature.
7. Protect aesthetic qualities: Alternative 5 protects aesthetics. It proposes to harvest small, selectively cut units.
8. Have a special management program for yellow cedar: Alternative 5, as all other alternatives, would not cut any cedar. None were located in any unit during stand exams, and a mitigation measure is included in all alternatives that would protect cedar trees if any are found.

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I would like to comment on the Point Couverden Timber Sale. The same persisting question must be asked again and again. Why is the Forest Service spending millions of our hard-earned taxpayer dollars on expensive roads that benefit very few and create ecological damage? The fact that government subsidies are going into pockets of large construction companies at taxpayer expense, and damaging our National Forests at the expense of multiple use management is plain wrong. Such wasteful government spending should be stopped and the timber industry log from the existing road system. I support a no-action alternative for the Point Couverden Timber Sale.

AB-1

Negative economic impacts due to heavy road subsidies are not the only reason to take a no action alternative. Twenty million board feet of timber are to be clearcut in an already impacted area. Not only is this discouraging to our visitor industry by the visual scarring of hundreds more acres of forest land, but it is one of many timber sales that will negatively impact the Juneau area. The short-term gain for the benefit of a large timber company lasts hundreds of years. An impact never measured is the emotional impact upon visitor and resident. Not only is wildlife being displaced and heavily impacted for many years, but it is disturbing to have to look at if you are a pilot, fisherman, local resident or recreationalist.

AB-2

AB-3

AB-4

If the Forest Service has an interest in not bleeding the National Treasury and providing for the people in local communities, then it should invest in making smaller timber sales available to and approachable by the small timber operators. Small timber operators live in our Southeast communities and provide lumber products for local use. The jobs stay here and is a stable boon to the economy. But, when the FS makes it impossible for these operators to exist in the Tongass due to huge timber sales that only large industry can bid on, then it's not surprising that the people who take the time to comment are opposed to the way it does business. I urge that the Forest Service take these comments into serious consideration and adopt a no-action alternative.

AB-5

AB-6

Sincerely,

Anissa Berry
PO Box 8118
Port Alexander, AK 99836
907-568-2210

Response to Anissa Berry

AB-1: The reasons for this project are discussed in Chapter 2 and in Appendix A.

AB-2: Your comment suggesting that 20 MMBF of timber will be clearcut is not correct. The preferred alternative does not propose clearcutting 20 MMBF of timber. A clearcut with reserve prescription is proposed for approximately 561 acres (at least 10 percent of the trees would be left) and 203 acres would be selectively logged. Other alternatives propose other mixes of acres and harvest prescriptions.

AB-3: The emotional impact on residents and visitors varies. Some commentators supported the project and others did not.

AB-4: The analysis shows that impacts to wildlife will not be heavy. A relatively small portion of the project area would be affected by the proposals. The alternatives would have little or no effect on the 198,000-plus-acre IRA in and north of the project area. All alternatives meet the visual requirements for the area. Refer to the photos showing views from key viewing areas under the proposed alternatives in the Scenery section.

AB-5: Alternatives 5 and 6 propose small timber sales as you request. Alternative 5 is based on a proposal from local residents that would provide between 100 and 500 MBF per year for 10 years and includes no road building. Alternative 6 proposes a sale of approximately 6 MMBF.

AB-6: Your support of Alternative 1 is noted. Alternative 1 would not meet the Purpose and Need for the project, as stated in Chapter 1 of the EIS. Alternative 1 would not manage the timber resource on suitable timber lands for production of saw timber and other wood products, it would not contribute to meeting the annual market demand for Tongass National Forest timber (including the needs of the local community), provide opportunities for resource uses that contribute to the local and regional economies, or support a wide range or natural-resource employment opportunities within Southeast Alaska.

Paul Berry
PO Box 143
Gustavus, Alaska 99826
pnberry@gustavus.ak.us

March 24th, 2004

Couverden Timber Sales Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041
comments-alaska-tongass-juneau@fs.fed.us

Dear Forest Service:

I appreciate the opportunity to comment on the Couverden timber sale DEIS. I am familiar with the last Couverden timber sale, 1984-85, and I wonder how many people working on this plan were a part of that plan?

PB-1

From what I understand the current market for Tongass timber is virtually non-existent, far worse than during the last sale. Even in your own DEIS (p.2-12) you admit, "none of the proposed alternatives are economically viable under current market conditions." To make this sale even remotely attractive to a bidder, the Forest Service will likely sell at base rates and offer an round log export permit, guaranteeing the continued loss of millions of taxpayer's money with little, if any, benefit to the local economy. Therefore, I cannot support alternative 3, it is a travesty.

PB-2

I support Alternative 5 in the DEIS, the one modeled after a plan worked up by Gustavus residents, although the Gustavus plan suggested harvesting in perpetuity. The Forest Service alternative omits this concept. I urge the Forest Service to revise alternative 5 to include the "in perpetuity" concept and accept it as your preferred alternative. I find it grimly ironic that the Forest Service, charged with the stewardship of our nations National Forests, can't plan, think or propose beyond 5 years. What a travesty of your stewardship mission. Alternative 5 would allow small scale timber operators, who live and work in this area, the opportunity to bid on the timber sales. Here is your chance to take a bold step and help support our local economy and show the nation a sustainable logging proposal. I urge you to think about it.

PB-3

It has also come to my attention that, under a new Forest Service policy, the Forest Service will no longer hold hearings in regards to any action occurring in Alaska (except for subsistence hearings required by law under ANILCA). I strongly oppose this change in policy. The Tongass is public land and I have a right to testify on lands that are important to me and my community. I oppose substitution of the open house concept and ask that the Forest Service return to holding hearings in effected communities. Please work with us rather than around us. The forests are our future please manage them more carefully.

PB-4

Thank you for this opportunity to comment on this important issue.

Sincerely,

Paul Berry

Response to Paul Berry

PB-1: Generally, the people that have been involved in planning this project and in analyzing the effects of the proposed alternatives have not been involved in planning the past harvests in the Couverden area.

PB-2: You are correct that the DEIS discloses that none of the alternatives is economical under current market conditions. If timber prices increase by approximately \$20 /CCF (\$40/MBF), Alternative 6 would be economical. An increase of approximately \$46/CCF would make Alternative 3 economical. Refer to Table 3-27 in the DEIS.

PB-3: The Forest cannot include harvesting a given volume per year “in perpetuity.” This proposal seeks to meet direction in the current Forest Plan, which includes harvesting timber from a portion of the project area (the Timber Management and Scenic Viewshed LUDs, refer to Figure 1-2). The current Forest Plan will be revised in the future. We have no way of knowing if the Couverden area will include LUDs that permit timber harvest or what standards and guidelines may apply during the next planning period, much less over the next 100 years. These standards and guidelines have changed significantly over the past 20 years and may continue to change as new scientific information is gained.

PB-4: Your comment that the Forest has changed its public involvement process for timber sale EISs is not correct. Holding formal hearings has not been a requirement. Public meetings can follow, and have followed, various formats. For example, informal information workshops were held for the Madan and Skipping Cow EISs several years ago to allow members of the public to ask specific questions and gather general information about the projects. As noted, formal hearings were held in Hoonah and Gustavus for subsistence.

Couverden Timber Sale Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

Dear Sir or Madam:

I appreciate the opportunity to comment on the proposed timber sales in the Pt. Couverden area. I live in Gustavus and have visited the project area on several occasions, and of course I view it from the air every time I fly in and out of Gustavus.

Thank you for including Alternative 5 in the draft, as well as for setting aside old growth reserves in all alternatives, for including alternative harvest methods, and for excluding the bear habitat area along "Homeshore Creek" from cutting in this planning period. I also appreciated the informational meeting held in Gustavus.

NB-1

My first choice is Alternative 1 (no action) because it makes the most sense from both fiscal and environmental perspectives. As many have noted, the amount of taxpayer subsidy needed to log this area is not justified by the few jobs created; it would be cheaper to simply write checks to those who would otherwise be employed in the timber industry. Better yet, pay them to restore trails, streams, and road crossings. Subsidized logging makes even less sense considering that it detracts from industries that are self supporting -- the "mangy" look of Pt. Couverden detracts from the pristine wilderness that tourists travel to see and often has negative effects on salmon rearing streams so important to the fishing industry. Finally, roads and clearcuts diminish wildlife habitat.

NB-2

I understand that most of these arguments fall outside the scope of this EIS as the Forest Plan has already established a harvest level based on a timber base that includes this project area. However, I also understand that there is no specific target for harvest in this area and that all alternatives are viable, so I hope you will choose Alternative 1 for the sake of the budget deficit and common sense.

I am not opposed to all logging and I prefer the no action alternative only because of the economics of logging in the project area. Subsidies aside, I support Alternative 5 (the "Gustavus Alternative") because it seems to do the best job of meeting the Forest Service's own four goals as set forth on page S-2. Specifically,

The other alternatives do not meet the "even flow" objective. The preferred alternative, for example, proposes 20 mmbf over the next decade. As far as I can tell, an average cut of 2 mmbf/year in this project area is at least double what is sustainable on a long-term, even-flow basis given the 100-130 year rotation mentioned at the public hearing and the 50.8 mmbf "available for harvest at this time" (S-3). Alternative 5 was developed specifically with a constant, perpetual timber supply in mind. It appears that choosing the harvest level in the preferred alternative must result in a reduced harvest at some time in

NB-3

the future. While the planning period is only the next 10 years, I assume the goal of "long-term sustained even-flow harvest" goes beyond the planning period. Because this project area is by far the most convenient timber supply for Gustavus I would like to see a discussion of the effects of the various alternatives on the long-term, even-flow supply to small local operators.

The second goal mentioned is to provide a timber supply to meet the market demand. Based on local discussions such as those at the meeting in Gustavus, it appears that Alternative 5 would do an excellent job of meeting local demand both during this planning period and (unlike other alternatives) into the distant future.

NB-3
Cont.

Alternative 5 also excels in providing resource and employment opportunities. Its selection and patch cutting are compatible with tourism as they would detract from the scenery much less than the clearcuts specified in other alternatives. Mountain biking or hiking on the road system would be much more attractive if there were not clearcuts in that area, leading to increased eco-tourism.

Besides best meeting the stated Forest Service goals, Alternative 5 does it in a manner that does not impinge on roadless areas, allows some of the production timber areas to approach old-growth status by using a long rotation, preserves yellow cedar, and maximizes wildlife habitat. This seems to be missing altogether from the discussion. I also question some of the other representations about Alternative 5; on page 2-9 the DEIS states that Alt. 5 offers 100 to 500 thousand board feet for sale annually. 100 thousand board feet probably would not meet annual demand but table 2-4 shows 8 million board feet. Over the 10 years of the project, this looks to me like an average of 800 thousand board feet per year -- enough for small local operators.

NB-4

OTHER COMMENTS

I found it hard to determine from information presented in the EIS what the "even flow, long-term sustained yield" for this area might be because I could not find what the available timber volume is, nor could I find a discussion about the rotation period. Page S-3 states that as much as 50.8 mmbf could be available for harvest at this time, but what is the total available for harvest over the entire rotation period?

NB-5

I also think selection and patch harvest methods are misrepresented as being less economical than they are. At the public meeting we were told about the pre-commercial thinning that is being done in old clearcut areas at significant cost to the taxpayer. As far as I can tell, these costs are not included in the estimated clearcut harvest costs. Because thinning is not necessary in areas logged selectively, comparing only harvest cost is misleading. I would like to see a discussion comparing the total costs of forest management using the various harvest methods. Better yet, I would like to see an adjustment factor built into the economic model to account for this difference so that .

NB-6

Finally, in Chapter 3, Issue 5 - Scenery, the view from the air does not seem to be mentioned as a visual priority route even though most independent travelers to Glacier Bay and Gustavus fly right over the project area -- and the clearcuts look bad to anyone seeking the Alaskan

NB-7

wilderness. While Alternative 4 may do a good job of protecting the view from Icy Strait, Alternative 5 does the best job of protecting the critical aerial view by means of selection and patch harvesting.

NB-7
Cont.

Thank you for the opportunity to comment. I hope you will select Alternative 1. Failing that, Alternative 5 does the best job of protecting critical values while providing a truly useful long-term even-flow timber supply to enhance the stability of local communities.

Sincerely,

Nathan Borson

Nathan Borson
PO Box 211 * Gustavus, AK 99826
(907) 697-2313 * (775) 806-8574 FAX
nate@borson.net * <http://www.borson.net/nate>

Response to Nathan Borson

NB-1: Your support for Alternative 5 and for expanding the old-growth reserves is noted. All action alternatives would expand the old-growth reserve. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

NB-2: Your support of Alternative 1 is noted. Alternative 1 would not meet the Purpose and Need for the project, as stated in Chapter 1 of the EIS. Alternative 1 would not manage the timber resource on suitable timber lands for production of saw timber and other wood products, it would not contribute to meeting the annual market demand for Tongass National Forest timber (including the needs of the local community), provide opportunities for resource uses that contribute to the local and regional economies, or support a wide range of natural-resource employment opportunities within Southeast Alaska.

NB-3: None of the alternatives exceeds the sustainable harvest potential for the area. An analysis of the sustainable harvest level for the Couverden project area is documented in the Timber Resource Report. See the response to NB-9 below.

NB-4: Your statements that Alternative 5 would best meet the local timber supply, would be best for eco-tourism, and would best protect the roadless area are noted. See the response to NB-1 above.

NB-5: Thank you for pointing out the error in the total volume for Alternative 5. This has been corrected in the FEIS.

NB-6: The Timber Resource Report includes an analysis of even-flow, long-term sustained yield for the project area. It includes previous and proposed harvest. The analysis concludes that a sustainable harvest of 9 percent of the suitable volume per decade is sustainable. The base year was 1979; the year the first harvest occurred. Approximately 342 MMBF existed prior to harvest on land currently considered suitable. Approximately 46.2 MMBF has been harvested from these suitable areas. This is less than 9 percent per decade. Alternative 2 has the highest proposed harvest volume, 27.4 MMBF. This is less than 9 percent. The analysis assumes a 100-year rotation for the Timber Management LUD and a 170-year rotation for the Scenic Viewshed LUD. This analysis did not include thinning volume that may be harvested from second growth stands in the future. This information has been added to the FEIS.

NB-7: The need for stocking control (precommercial thinning) will not be known until the stands are 20 to 30 years old. Some units harvested using a clearcut prescription in the early 1980s have been thinned while others have not. Some stocking control may be needed on selectively logged areas.

NB-8: Under the standards and guidelines of the Forest Plan, effects on scenery are analyzed from KVAs on the land and water, not from the air. Refer to page 3-196 of the FEIS to the Forest Plan for a discussion of why airplane routes are not visual priority travel routes.

Response to Corrie Bosman, Center for Biological Diversity: See Mark Rorick, Sierra Club (joint letter)

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Judy Brakel

Gustavus, Alaska
March 19, 2004

RECEIVED

MAR 22 2004

Juneau Ranger
District

Couverden Timber Sales Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, Alaska 99801-8041

Dear Forest Service Staff:

The attached document is the record of a public hearing held at Gustavus concerning the Couverden Timber Sales Draft EIS. The Gustavus Community Association wrote to the Forest Service requesting a public hearing on this DEIS. The request was denied. The Gustavus Community Association therefore voted to hold a public meeting in lieu of a Forest Service hearing, and to present the recorded comments in written form to the Forest Service.

Yours truly,



Judy Brakel

GUSTAVUS PUBLIC MEETING held in lieu of U.S. Forest Service public hearing

**On the Couverden Timber Sales Plan Draft Environmental Impact Statement
Gustavus, Alaska, March 18, 2004**

The Gustavus Community Association (GCA) sent a letter to the Juneau Ranger District of the U.S. Forest Service (USFS) requesting that a public hearing be held in Gustavus on the Couverden Draft Environmental Impact Statement (DEIS). The Forest Service refused this request; USFS Region 10 (Alaska) has a new policy of holding no public hearings on its proposed actions in Alaska, except for the Subsistence hearings required by the Alaska National Interest Lands Conservation Act. GCA protested that policy, and voted that in the case of such a refusal we would hold our own public meeting immediately following the USFS Subsistence hearing. We would tape the comments and transcribe them for submission to the agency as written comments. The meeting was attended by 25 people and was moderated by George Jensen. What follows is the transcript of that public meeting.

GCA-1

Greg Streveler, resident of Gustavus: Mr. Streveler requested time to explain the locally-generated proposal that was included in the Couverden DEIS as Alternative 5 [Note: the USFS "preferred alternative" is Alternative 3.] When Mr. Streveler was speaking there were problems with the tape recorder, so he offered to write up his explanation for inclusion in the meeting record. This is his written version, including an Appendix explaining the timber calculations:

**The Local Alternative for Timber Management at Couverden
Greg Streveler March 20, 2004**

INTRODUCTION

When the Forest Service began planning for a new round of timber sales in 2002, several Gustavus residents assembled the following proposal with the help of the Juneau Ranger District staff. An incomplete sketch of this proposal was included by the Forest Service as Alternative 5 in their Draft Impact Statement issued in December, 2003.

GCA-2

The basic premise of this alternative is that Couverden is the last chance to get timber management right on public lands in the Icy Strait region. A look at the map shows that only the eastern end of the region is open for logging. Of that, the Forest Service and Native corporations have scalped NE Chichagof. Gustavus timber is too young to be very valuable, and is mostly privately owned in small parcels. Couverden is the remaining large block of old-growth timber. The Forest Service is off to a bad start here also, allowing two poorly conceived sales that have taken a big bite out of the timber base. However, there is a lot of timber left, and a useful road system, yard and transfer facility is in place. The main thing now is to see that in the present round of planning, the Forest Service doesn't continue to clearcut away our future options and sell them for a song to exporters.

The local alternative is an attempt to make ecological and economic sense of timber management at Couverden that factors in the needs and opportunities for our region.

OBJECTIVES

These are the beginning assumptions we used to put the alternative together:

- Harvest sustainably, in perpetuity
- Build no new roads outside the presently roaded area
- Design sales to maximize their utility to local timber operators
- Use a rotation length that regenerates high quality timber
- Protect key wildlife habitat
- Use harvest methods that mimic nature
- Protect aesthetic qualities
- Have a special management program for yellow cedar

PLAN DETAILS

Available Timber

We began by getting data on timber volumes and acreages in the roaded area, as defined on Forest Service planning maps. This took some work and extrapolations, as they only had firm data for the pool of possible cutting units, which make up only about 15% of the total roaded area. The method for working out the extrapolations is given in Appendix I. We concluded:

- 1) after removing acreage from the timber base for inoperability, key fish & wildlife habitat, and previous clearcutting, about 40% of the total roaded area should still be available for harvest;
- 2) being very conservative, at least 100 million board feet (MMBF) of timber remained available on this acreage.

Rotation Length

After looking at a lot of stumps and live trees at Couverden, it is clear that it takes at least 200 years to grow a high quality tree there. That is also the minimum time it takes to restore a logged area to full value wildlife habitat. So we took this as our suggested MINIMUM rotation length.

Allowable Cut

Dividing 100 MMBF by 200 gives us an annual maximum allowable cut of 0.5MMBF. After talking to local timber operators, it is clear that this is also about the maximum they can handle, even if they join forces to do it.

Sale Configuration

The Forest Service would prefer to sell the timber off in big chunks, which has three problems for locals: sales are too big for local mills; they don't provide an even flow of timber; and there is no guarantee of sustainability. A key part of our plan is to offer sales that provide an even flow of timber at the maximum rate of 0.5MMBF/year, which according to our calculations can be done in perpetuity.

Harvest Method

The goals is to mimic natural forest conditions. Gustavus has a long history of opposing clearcutting, because we know it to be ecologically damaging and aesthetically unacceptable. Our alternative envisions only selection cutting and small cut patches staying smaller than four acres. Individual good trees can be harvested, but in general we

GCA-2
(cont.)

want to avoid high-grading so that a supply of the best trees is always available to sawyers and wildlife.

Cedar Management

This beautiful and valuable tree is scarce in the region, and has been mercilessly scalped off of NE Chichagof, where it is most common. Less than 1% of Couverden timber is cedar. Our plan envisions very careful harvest and efforts to encourage establishment of new individuals to replace the ones cut.

Appendix I

TIMBER CALCULATIONS

We want to design an alternative that allows a small annual cut that can be sustained in perpetuity on timber that can be accessed from the existing permanent road system with a minimum of temporary roading. So the first thing we need to know is, what is the timber base within the area accessible from that road system.

If we take as a first approximation of this roaded area* the USFS depiction of it as shown on their recent maps, and use figures provided by the JRD's McCoy on 9/5/02, we can do a first approximation of the timber base, as follows.

The USFS figures show that the aggregate area of their initially proposed cutting unit pool is 1718 acres. I suggest that we delete the portion of cutting unit HS 2 along Homeshore Creek in the roaded area because of its high habitat value (96 acres). This further reduces the area in the cutting unit pool to $1718 - 96 = 1622$ acres.

GCA-2
(cont.)

To estimate the timber base in this unit pool, we have to do a little math. The FS gives the amount of timber in the unit pool as 50.8 million board feet (MMBF). Multiplying this number by the ratio of the original unit pool acreage to the reduced one ($1622/1718$) gives us a figure of 48 MMBF.

The next step is to make an estimate of the timber base in the portion of the roaded area we think could be logged over time. To do this, we have to make some estimates and assumptions. By visual inspection of the FS maps, I estimate that 30% of the roaded area was logged in previous sales. This is obviously not available for harvest in this rotation, and should be removed from the calculation. I also estimate visually that an additional 15% of the roaded area does not have commercial quality timber on it &/or is too steep to be operable, and should be removed also. Finally, I suggest we remove another 15% for old growth, riparian &/or habitat retention. Thus in aggregate, we've removed 60% of the total roaded area from further consideration, leaving 40% that will be managed for timber production.

I further estimate by visual inspection of the maps that the cutting unit pool proposed for this sale makes up about 15% of the roaded area, which works out to 38% of the remaining 40% containing timber we agree to cut. To obtain a crude approximation of how much timber is available on the 40%, we would divide the figure of 48 MMBF by .38, which gives us approximately 126 MMBF**. Since this is a very crude estimate based on several uncertainties, let's be conservative and reduce it to 100 MMBF.

With this estimate in hand we are now in a position to calculate how large a cut is sustainable over, say, a 200 year rotation. $100 \text{ MMBF} / 200 \text{ yr} = .5 \text{ MMBF/yr}$ allowable average annual harvest***.

Notes:

- *- This area is a generalization and includes more acreage than what is strictly roaded.
- ** - Making the further assumption that the unit pool is representative of the larger area.
- *** - For subsequent rotations, the 30% of the roaded area removed from the first rotation calculation will be back in the equation. This addition will have the effect of further hedging our bets as we approach the end of the first 200 year rotation.

GCA-2
(cont.)

Janusz Kunat, resident of Gustavus: I have a manufacturing process in Gustavus, I process wood – round wood – I produce a value-added product. I utilize, right now, western red cedar, which I import from Prince of Wales Island. But I also try to utilize some wood that is available in Gustavus on my property – the spruce, and actually some hemlock. First of all, I would like to say I go through very little wood, but my wood is the highest quality that I can obtain, and the reason I go out for the western red cedar that doesn't grow in Gustavus – but spruce does, and hemlock does. But the wood is not of the quality I would like to produce. I have a little dry kiln – I dry to very low moisture content, and able to process to different shapes.

GCA-3

The wood that is available in Gustavus is a very young wood that has too many imperfections. The wood that is available outside of Gustavus – the old growth wood – it's such a quality that... we won't see it once this wood is gone. We won't be able to replace it. I come from Europe, so I've never seen such beautiful wood as grows here in Alaska. It's absolutely unparalleled quality. What I see – that same wood is being sold for absolutely nothing. I mean absolutely nothing. I believe it's worth a lot of money. As an example – you can make anything out of good quality wood, such as is at Point Couverden. One log about 30 inches in diameter, 16 ft. long, cut to 1 x 4 lumber – boards – produces \$20,000 worth of product. After the wood is dry and processed. That's a tremendous value. You don't need to cut a lot of wood. A few logs would benefit lots of people. That's why I'm opposing any clearcutting, and I would like to speak to people who make the decisions about making it available for a long time.

Lou Cacioppo, Gustavus resident. I've lived in Alaska for 30 years. First of all, I'd like to say I'm opposed to the Forest Service new policy of this open house crap, because doing away with public hearings – is just a means, a new policy, to help you guys do what you want to do without any opposition. I don't know if you guys hire local (?) for your standard operating procedures now. Maybe you have.

Anyway, I've cut timber in Southeast Alaska and run a sawmill. And lived in Ketchikan – I saw some devastating logging – clearcutting. Ripple (?) Creek, Slide Ridge with five active slides – we tried to get that stopped and we couldn't. It was watershed property for some people. So that went ahead and got clearcut. I'm totally against clearcutting, I think it's a bad policy, a lot of wood gets wasted.

GCA-4

And – compared to the wood I used to cut – I've milled a lot of logs here in Gustavus – and it's not really very good wood, like Janusz said in his statement. It has very rapid growth and wide annular rings. When you cut it, I think maybe 50%- 60% of the wood is going to be usable and the rest is cull. Now to cut down and log a bunch of

trees for 50% of the tree is a sad deal. I mean, I'm a carpenter as well, I use a lot of wood, so I'm not against logging. I'm – conscientious logging, done with integrity. Selective logging, I'm all for it. And if you're going to do this program – I hope that's the way we're going to go, and have a conscience about it.

My other concern is red cedar, yellow cedar – I don't know if there's any in Couverden. It was mentioned there were some cedar trees there, and I didn't even realize that. I hope that's not going to be bundled up in the spruce pile and divied up that way – because it's been done in the past, where that red cedar, yellow cedar, has gone out at that spruce price per board foot, which is a sad deal to see that kind of wood do that.

Again, I just hope when this sale comes off that the Forest Service uses some good conscientious thought and process. I'm also very disappointed in one of the fines levied against – I might be mistaken which logging company it was – it might be SEALASKA or Cape Fox – logged up to a stream, and it was supposed to be a protected stream. They were fined \$3,000 and they took \$3,500 worth of wood out of there, so that doesn't make any sense to me. So I hope if somebody does any of that type of violation, you guys get on line and, better than slapping somebody's hand, make it so they don't want to do it again. Don't fine the \$3,000 and they make \$500 on it. That's all, thank you for your time.

Nathan Borson, Gustavus resident. I do miss the public hearings, even though I'm comfortable sending written testimony. It's easier for people - not everybody writes easily or well, they speak better, and the importance of hearing each other I think is also very valuable and an important part of the public participation.

I'm looking at the Forest Plan "goals and objectives" section here and one of them is to management the timber for production of saw timber and other wood products from suitable timber lands on an even-flow, long-term, sustained yield basis and in an economically efficient manner. I think that Alternative 5 does the best job of doing that. It is the only alternative that seems to have a truly long-term outlook. If there are only 100 million board feet - according to the DEIS maybe 58 million bd ft that could be made available now – if just harvest that over a 200 year, or even 100 yr rotation, these other alternatives are not going to produce that in a sustained, even-flow fashion. You're going to have jumps in supply where you harvest 20 million bd ft in the first 10 years. You're going to have to wait – you're not going to be able to harvest that on a consistent basis.

Another goal was to harvest sufficient to meet the annual market demand. We've already had 2 people here tonight talking about the need for small sales that work for small independent operators, and that would be the most beneficial. And that also seems would be best met by Alternative 5.

And "provide a diversity of opportunities for resource uses that contribute to the local and regional economy, and support a wide range of natural resources employment opportunities." Again, I think Alt. 5 best meets these goals. It's treatment of harvesting by patches and selective harvesting, I think from the air is very important – in the EIS it talks about "visual priority routes," but I didn't see the air route mentioned in there, and that's how so many people come to Gustavus. So many tourists see that area and I think that to preserve the view from the air as much as possible it will require selective harvest or patch harvest. That's all I have now, thanks.

GCA-4
(cont.)

GCA-5

Judy Brakel, Gustavus resident: One think about having a long-term, sustainable timber program in this Couverden area, such as proposed in Alt. 5, is that we don't have a lot of other areas that we could have that in, here in Icy Strait. Because here on the mainland most of it is the National Park until you get over to the Couverden area. On the other side of Icy Strait from a little to the east of Pt. Adolphus all the west along the coast itself, that's a LUD II, so no logging is allowed. And no logging is allowed on the islands in Icy Strait as well. And then if you go a little bit further eastward toward Hoonah, a lot of that is Native Corp. land, and that's already been harvested heavily, and it's harvested by and for the Native corporations. And the rest of it over there is Forest Service, but it's already been logged really, really heavily. So where else, but in the Couverden area, would we be able to have a sustainable, local timber base to operate on? So that's one of the reasons I favor Alt. 5. Thank you.

GCA-6

Lou Caccippo again: I just want to add that I support Alt. 5 logging plan. Thank you.

GCA-7

Charlie Rice, Gustavus resident. My comments are going to written, and they're going to deal with the financial aspects and the legalese, and it would be really boring to talk to you about that. So what I would like to do would be to just ask if there's anybody in this room who actually supports clearcut logging anywhere, not just here. Is there anybody in this room – any resistance to logging the way it's been done in the past. Is there anybody who supports any of the proposals except 5 and 6 ... 5. Six is mine. Is there anybody here that supports any proposal that involves large-scale clearcuts.

GCA-8

[Carol Djecka did a count] – 23 (Note: 24, as the person running tape recorder forgot to vote. The moderator did not vote.)

Bill Brown – In that case, why don't you get a voice vote – “Do we support clearcut logging as in the conventional proposal?”
“NO” (loud and unanimous).

GCA-9

Charlie Rice: Thank you. I've been to many of these meetings before and we always say the same thing, but the Forest Service comes off with their preferred rape mechanism and we're supposed to decide which way we're going to be raped. So we're pretty much unanimous on that, right?

GCA-10

Steve Little, Gustavus resident: I have Little Wood Products, a small wood mill, manufacturing value added ... People are building homes, or remodels, and a lot of times this wood is having to be imported from Canada, and here we are in the Tongass National Forest. Why should we have to go to Canada, why should we have to go to Oregon to get our wood?

GCA-11

Bill Brown, Gustavus resident: The more I think about this Alt. 5 – the one that Greg Streveler, Jim Macovjak, Paul Barnes and others have worked on, the more I see a possibility for the Forest Service to chart some new ground and take upon itself the promotion and assistance of a model that does have true sustainability, and does have the possibility, by way of value-added approaches and long-term sustainability – to have an on-going, modern forest industry in Southeast Alaska that would allow the recovery of

GCA-12

Tongass National Forest from ill-advised and very unsightly clearcuts. It seems to me that this is an opportunity, particularly given the fact that this is not a massive timber resource here, it's a relatively small-scale timber resource compared to what has gone on in the southern regions of Southeast. This is a place where the Forest Service could chart out some new ground and really create a model for long-term and local community-benefiting forestry.

GCA-12
(cont.)

Vince Schafer, 12 yr. Resident of Gustavus. I make my living fishing and now logging. Two small sawmills and a bunch of worn-out equipment. But I'd like to add that it's paid for and puts food on the table, and it's not being subsidized by any federal grants. So I consider it a successful operation.

I'd like to go on the record supporting Alt. 5 – it's the only that makes any sense to any small operation. These larger million – even million bd ft., 10 million bd ft. sales don't have any meaning to us, excepting that when we do need the timber it won't be there. It might be on a ship on the way to Japan. And I'd like to add that I counted the other day six sawmills – operating sawmills, part-time in Gustavus alone. We have furniture makers here, instrument makers, a lot of carpenters. A lot of potential users of the wood, and a lot of potential jobs. So it seems the Couverden area – it's ideal for Gustavus. It's kind of self-interest. I mean it's right down Icy Passage so it's ideal for our situation. You've got to keep jobs in Alaska. There's a lot more potential than what's here now, I think if the timber was available it would actually be a big boost in the economy, I mean the working economy – that's what I'm for. Everyone has their ... I kind of like a productive economy. And there's all kind of craftsmen here, we just need the wood. So I'd like to go on record as supporting Alt. 5. It's the only sustainable alternative that I see at this time. It makes good sense for us and makes good sense for the environment. So – thank you.

GCA-13

Paul Barnes, Gustavus resident. I want to mention mention a couple facts. I would challenge anyone to look them up and see if I'm correct. Right now in Southeast Alaska there are less than 300 timber jobs. That's 0.5% of the Southeast economy. In 2002 the U. S. Treasury spent \$36 million on the Tongass timber program. We cut 35 million board ft. Last year we cut 48 million board ft., of which 16 million was for the Intertie, which means we cut more like 32 million bd ft. in the sales, and spent \$36 million. That works out to over \$100,000 per logging job. Why are we doing this?

And right now, in the DEIS, on page 2-12, I quote: "None of the proposed alternatives would be economically viable at current market conditions." Why are we doing this? This is madness. Janusz was totally correct when he said this wood is irreplaceable. And yet the Forest Service's own rotation, which Dave Carr told me tonight, is 130 years. Which means we're not replacing what we're taking. We're going to make sure that these forests will be like every other forest down south, which is the faster growth wood, like the wood around here [Gustavus], which means there'll be zero harvest.

GCA-14

A truly viable wood products here has to be different. We can't just look at Georgia or Washington, or even British Columbia, and say "They do like this, and therefore let's just do it like that here." It will never work. It's the slowest growing forest in America, we're too far from the market, and labor here is too expensive. The Tongass

has one tenth of one percent of the world's timber. As an example, in comparison Russia has 20%, and they work a lot cheaper than we do. For a wood products industry truly to work here, and be truly sustainable, we have to replace what we're taking. Therefore Greg's idea of a 200-yr rotation to me is a minimum. If you look around, I dare say probably even slower than that if you really want to replace what we're taking. If you want to replace the old-growth conditions that we're taking away. My guess is, going to be more like 250, even 400 years. Secondly, we must mimic nature. That is, clearcuts less than 4 acres. That's just an idea. I think Paul Alaback, who's probably as well respected as anybody in this, mentioned that size. And it's because that way you would not disturb other users and other creatures who are living there. Also, I would hope some day this industry would benefit the local economy. If you have people here cutting the timber and actually using it here, those dollars stay here, they don't float out of here on some boat from Hoonah to Japan or wherever else. The Forest Service's current preferred alternative will only work – and I guarantee you the only way it's going to fly – is they will not get any bidders in the first go-round and then they'll go to base rates and give an export permit, and there'll be even less benefit to the economy then. So why, again, are we doing this? This is madness.

The reason we came up with Alt. 5 – and I thank Greg for doing most of the work, and Judy – is that to us it's an attempt to take away some of the madness, and to make some sense of something that might actually last, into the future. Thanks.

Greg Streveler again: I'm not going to go back over what I said before, but I'll write it down. Something Vince was saying really struck home to me. And this is what I learned being the GCA chair, and this just reinforced that. If you look around Southeast, a lot of the communities in Southeast are kind of drying up. And I think Pelican is a perfect example, it's kind of a one-trick pony. If the pony goes dead on you, you die with it. And perhaps the only really viable kind of community is one that learns to use its resource base sustainably. It's fine if we can kind of go elsewhere and make our living and bring it back here, but you can only do so much of that. And also, it's hard to base a real community on that. Here's our – as I think Judy said – it's our one chance as far as timber goes. We've blown most of the rest of it. And to our credit we've locked quite a bit of timber up too. This is the one place that really is available to us, to harvest it right. And I want to reiterate that Alt. 5, at least if it's fleshed out right – and the Forest Service didn't do a very good job in their document – it's not a 'lock-up' plan – this harvests as much timber as their plans do. I think it was Nate who used the word "even-flow." It's a plan that allows, in perpetuity, a dole-out of timber at the right rate that people in a real place can use it for real things.

Janine Driscoll, Gustavus resident. I also support Alt. 5, because of a lot of the reasons that have already been mentioned. It's the alternative that is most sustainable and meets the stated goals of the Forest Service. But also I'd like to point out that the other Alt., 3, is stated that it will harvest 345 acres of high old-growth, 301 acres of medium old-growth, and I think that we don't have enough old-growth as it is. And all of these sales are – as it also says in this document – are at a loss. And so instead of harvesting this old-growth that has much more value standing and alive, I think that we should not cut down all the old-growth. And by contrast Alt. 5 leaves old-growth standing and cuts it down at

GCA-14
(cont.)

GCA-15

GCA-16

a much more sustainable, and it's used for a higher purpose than just cutting down the trees.

GCA-16
(cont.)

Charlie Rice again: 3 pounds of Draft EIS – it sounds like that when you drop it. It doesn't say – what we've been talking here tonight is sustainability, and in that whole thing, in the appendices, and the index, and anyplace I looked in there I didn't see that word. That's what we've been talking about, and that's not in that big book full of shit.

GCA-17

Janine Driscoll again: I wanted to add that I'm opposed to the Forest Service's new plan of not having these hearings, and I think that these hearings are a good way for the community members to listen to other people's opinions, that have other ideas, and information from a perspective that they often don't get from the formal document. So if one of the reasons for not holding these hearings is the cost of transcribing, perhaps they might want to just add that to the cost of the timber sale to be able to then pay for us to be able to have our public hearings. Thank you.

GCA-18

Bill Brown again: I want to add a thought to my earlier comment about local community resource approach. And that is that I think the timber sale approach for Alt. 5, which I've already endorsed, would be perhaps something organized around a community cooperative effort that would allow several small board feet users to come together and produce a viable bid, and I think that ought to be something that's considered in Alt. 5.

GCA-19

Response to Judy Brakel, Gustavus Community Association Public Meeting

GCA-1: It is not correct that the Forest has a new public involvement process for timber sale EISs. Holding formal hearings has not been a requirement in the past. Public meetings can follow, and have followed, various formats. For example, informal information workshops were held for the Madan and Skipping Cow EISs several years ago to allow members of the public to ask specific questions and gather general information about the projects. As noted, formal hearings were held in Hoonah and Gustavus for subsistence.

GCA-2: The Gustavus Community Association (GCA) estimate of the timber actually available over the next 100 years to a small operator with limited equipment and without expensive road reconstruction is greatly over estimated. A new bridge would need to be constructed to access the Homeshore Creek Road and three Class I stream crossings would need to be installed to access the Swanson Creek Road (both roads are currently closed). This would be extremely expensive given the small amount of volume that could be selectively harvested with a small operator's equipment.

GCA-3: Janusz Kunat's comments about the quality for the old growth wood from Alaska (but outside Gustavus) and its value once cut into boards are noted. Please note that no western red cedar was found in the Couverden area, and no yellow cedar was found in the proposed harvest units.

GCA-4: Lou Cacioppo's comments opposing open house public meetings, on the poor quality of wood in Gustavus, his opposition to selling the red and yellow cedar at the same price as spruce, and his hope that any violations of stream protections during harvest would be strong enough to deter future violations are noted. Please see the response to GCA-1 above regarding public meetings. Please note that no western red cedar was found in the Couverden area, and no yellow cedar was found in the proposed harvest units.

GCA-5: Nathan Borson's comments preferring public hearings over submitting written comments and his comments supporting Alternative 5 because it best meets the Forest Plan goals and objectives, which include providing a sustainable harvest of saw timber, meeting market demand for timber, and providing a diversity of opportunities for resources that contribute to the local and regional economy and supporting a wide range of natural resource employment opportunities are noted. Mr. Borson states that if there are only 100 MMBF available for harvest in the project area, the other alternatives are not sustainable. Please note that the Timber Resource Report includes an analysis of even-flow, long-term sustained yield for the project area. It includes previous and proposed harvest. The analysis concludes that a sustainable harvest of 9 percent of the suitable volume per decade is sustainable. The base year was 1979; the year the first harvest occurred. Approximately 342 MMBF existed prior to harvest on land currently considered suitable. Approximately 46.2 MMBF has been harvested from these suitable areas. This is less than 9 percent per decade. Alternative 2 has the highest proposed harvest volume, 27.4 MMBF. This is less than 9 percent. The analysis assumes a 100-year rotation for the Timber Management LUD and a 170-year rotation for the Scenic Viewshed LUD. This analysis did not include thinning volume that may be harvested from second growth stands in the future. If this is considered, the sustainable harvest per decade would be somewhat higher. Also refer to Table 3-28 in the DEIS for the percent of suitable and available acres proposed for harvest under each alternative.

GCA-6: Judy Brakel's comments that the Couverden area is the only option for a sustainable harvest area for the Gustavus community because other areas are either National Park, LUD II, already harvested Native Corp. land, or heavily harvested National Forest Service land are noted, as is her support for Alternative 5. See the response to GCA-7.

GCA-7: Lou Caccippo's comment that he supports Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

GCA-8: The meeting record notes that Charlie Rice asked if anyone supported any alternative other than 5 or 6, which is any large-scale clearcutting. The record notes 23 without stating whether the 23 were for or against. The comment that Mr. Rice supports Alternative 6 is also noted.

GCA-9: The meeting record notes that Bill Brown's request for a voice vote: "Do we support clearcut logging as in the conventional proposal?" received a loud and unanimous no vote.

GCA-10: Charlie Rice's comment that the Forest Service's alternatives always leave them choosing between poor choices is noted. The Couverden EIS includes a wide range of alternatives, including one based on proposals submitted to the Forest Service by the Gustavus community.

GCA-11: Steve Little's comment that they need wood and should not have to import it from Canada or Oregon is noted.

GCA-12: Bill Brown's comments that Alternative 5 offers the Forest Service an opportunity to chart new ground and has the possibility of promoting a value-added wood industry in Southeast Alaska are noted.

GCA-13: Vance Schafer's support for Alternative 5 is noted. See response to GCA-7.

GCA-14: Paul Barnes' comments on the high cost of timber sales and the few jobs they create and on the long rotation lengths needed to replace the trees cut are noted, as is his support for Alternative 5. See response to GCA-7.

GCA-15: Greg Streveler's comments on the importance of Alternative 5 to the community are noted. See response to GCA-7.

GCA-16: Janine Driscoll's support for Alternative 5 is noted. See response to GCA-7.

GCA-17: Charlie Rice's comment that the DEIS does not include the word sustainability is noted. Please note that the Timber Resource Report includes an analysis of even-flow, long-term sustained yield for the project area. Refer to GCA-5.

GCA-18: Janine Driscoll's comment that she is opposed to the Forest Service's new plan of not having public hearings is noted. Please refer to GCA-1.

GCA-19: Bill Brown's comment supporting Alternative 5, the community approach, is noted. See response to GCA-7.

Tim Bristol

Written Comment Sheet

Public Meeting for the Couverden Timber Sales DEIS

Thank you for your input.

Date: ^{Received} Mar 15 04

PLEASE PRINT:

Not all bad folks but who the heck is going to buy this?
I support ALASKA W/AN absolute ban on any Round log export.
This sale is of enormous cost to the public w/little overall benefit, please adopt the smallest, least impactive, cheapest logging alternative.
I would also like to see dedicated consistent monitoring of the roads for poaching & timber theft.
Finally, if Owen Graham is so desperate for wood, why are is the Agency cancelling sales?
Thanks for info. Tim Bristol

TB-1

TB-2

TB-3

TB-4

****Continue on back for more space****

NAME: <u>Tim Bristol</u>
ORGANIZATION:
E-MAIL ADDRESS: <u>seattim@aol.com</u>
MAILING ADDRESS/CITY/STATE/ZIP:

Names and addresses will be added to the mailing list for the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

Comments may be mailed to:

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

Response to Tim Bristol

TB-1: Your support of Alternative 6 is noted.

TB-2: Your opposition to log exports is noted.

TB-3: Your recommendation that the smallest, least expensive alternative be adopted because of the high cost and low return is noted.

TB-4: Your recommendation that consistent monitoring of the roads to prevent timber theft and poaching is noted.

I feel that the Forest Service should not consider building any more new roads in the Couverden timber sale because of the landslide problems that have been experienced in the past and their effects on salmon spawning areas in the streams. This has been a very serious problem in the past because of roads on steep slopes, and I assume more of these cable logging roads are being planned. From what I saw while in the Region, many of the present roads are not usable at the because of landslide damage. The maintenance of these roads will far outcost the actual building costs over the longterm.

TB-1

Terry Brock
Cambridge IL
Retired Regional Soil Scientist, Alaska Region. 1990-2001

Response to Terry Brock

TB-1: All new roads would be closed. Temporary roads would be obliterated and classified roads would be put into storage, reducing maintenance costs. Roads placed in storage are not considered usable by normal vehicle traffic (see the Glossary for definitions of obliteration and storage). Roads would avoid unstable areas.

Dear Juneau District Ranger
Tongass National Forest

I write to protest both the process and the substance relating to this proposed timber sale.

The comment instructions always ask for specific comments on specific points at issue. But I want to discuss the larger substance re: this particular sale and the still larger picture of future sales, perhaps as many as 100 of them. I am constesting the new procedural exemptions and short-cut rules for public participation relating to clear cuts.

The unofficial and unrecorded Open House format is a one-way street. It produces no public record. We hear a brief description of the sale, look at some maps, have a little chat while chomping our cookies, and file out when it's over. We have no meaningful interaction with Forest Service representatives, no real debate--just a reiteration of predetermined decisions. And we leave no authorized record of anything said, including any commitments or assurances the representatives might offer. It is a totally empty gesture. For without a public record there is no base line for agency accountability in the implementation of the sale and cut.

Moreover, the limitations on discussion--to specifics stated in this specific DEIS--cannot get us to the big pictures involved in this flurry of discrete sales.

Socio-economic, ecological, esthetic, fishery, etc., impacts of the proposed cut on the Icy Strait corridor cannot be substantively explored in such a format. The whole weight and variety of tourism considerations--including primary access to Glacier Bay National Park--is deferred in favor of discussions of detail--how many culverts, how many tenths of a mile of new road, etc.

This parts-and-pieces approach is not by accident. It is designed to keep us from contemplating the big picture. We don't get to the aggregation of impacts from all of these potential sales; we don't discuss the cumulative affects they will produce.

These substantive issues override the technical details of this sale and the others on the list. But of course we must not get general, for that would go beyond the scope of this particular DEIS.

We're regressing, by design, to a time when there was no plan for this great National Forest. We're junking the revised TLMP that did contemplate the big picture, BECAUSE it was a joint agency-and-public effort over decades--a balancing of factors and constituencies that resulted in reasonable compromises.

Finally, considering market factors, there isn't even a legitimate monetary reward in this exchange that will pillage public lands owned by local dwellers and visitors from afar.

William E. Brown
Box 225
Gustavus, Alaska 99826
907/697-2821

WEB-1

WEB-2

WEB-3

Response to William E. Brown

WEB-1: Issues larger than just this particular sale, such as future sales, are beyond the scope of this analysis. Where and how timber can be harvested, as well as the amount of harvest per decade across the Forest, are issues that were decided in the Forest Plan. These issues will be open for consideration during plan revision.

We do not agree that the public meetings held during the initial scoping process and following publication of the DEIS do not provide an opportunity for meaningful interaction between the public and the agency. These meetings allow the public to meet with specialists that are knowledgeable about the project area and the proposed alternatives. The public can ask specific questions and gather additional information about the area and the project. This allows them to better provide written comments on how the project affects them or on deficiencies in the analysis. These comments often result in changes in the proposed actions. We believe that written comments provide the best way for members of the public and other government agencies to provide meaningful input to the project. We agree that these meetings do not provide a “real debate,” but debates are not an objective of the scoping process. Also, we do not agree that this process does not provide a public record. Comments by the public and other agency staff, in the form of letters like this, and the Forest Service’s responses to these comments, are published in the FEIS.

WEB-2: We do not agree that we are “junking the revised TLMP that did contemplate the big picture...” This project is being undertaken in accordance with TLMP (the Forest Plan). The Plan identified portions of the project area as suitable and available for timber production and it established standards and guidelines for preparing and implementing timber harvest. We are not aware of any portion of the proposed alternatives that are not in accordance with the Forest Plan.

WEB-3: Timber would not be sold unless timber prices increase. Refer to the economic analysis in the FEIS for a discussion of this issue.

Murray Butten

RECEIVED

FEB 18 2004

2/12/04

Junior Forest
District

Thank you very much for
sending me the draft EIS
for the Couverden Timber Sales.
I commend you for all
of the hard work that
obviously went into this
document.

MB-1

I support alternative
4 somewhat over alternative
3 only because of concern
about the viewshed - as
you know Icy Straits
has been impacted heavily
by logging on native land
on Chichagof. It seems
to me that the future
of the Northern Tongass
will rely heavily on tourism
and, hopefully, fishing.
While I support logging, I

MB-2

think that it must, by
economic necessity, be
mindful of the concerns
of those two industries.

MB-3

Thank you very much
again for your time
and hard work.

Sincerely,

Murray Butcher
P.O. Box 20081
Juneau, AK
99802

Response to Murray Buthen

MB-1: Your comment commending us “for all the hard work that obviously went into this document” is noted. Thank you.

MB-2: We agree that protecting the scenic quality of the viewshed is important. All alternatives meet the visual quality objectives for the area.

MB-3: We agree that sales need to be economical. Timber would only be sold if prices rise to a level that makes the sale profitable.

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To whom it may concern,

I live in Gustavus in the summer and Juneau in the winter. I'm familiar with the Couverden area and I would ask you to choose Alternative 5. When I heard of the "citizen's alternative" put together by folks in Gustavus I was really excited. I thought here would be a great opportunity for the Forest Service to enter into a real collaborative process with a local community that would be most impacted by a timber sale. I know the people who worked on the citizen's plan and I know them to be very thoughtful, reasonable and intelligent folks, I was very supportive of their work. Needles to say I was disappointed to find that you did not include the actual alternative as it was written in your DEIS and did not pick Alt 5 as your preferred alternative. Your preferred alternative does not help small scale timber operators in the region. All it does is spend taxpayer's money on planning and roads to a sale that will not benefit anyone, to a sale that given the present timber market could only be sold at a loss to the American public. I am glad to see that all alternatives modify the OGR, a positive step. I am glad to see that your preferred alternative would avoid road construction and timber harvest in roadless areas but I feel that there is enough timber on the existing road system, so no new roads need be built. Please implement Alternative 5.

JC-1

JC-2

JC-3

JC-4

Jai Crapella
1204 2nd St.
Douglas, AK 99824
586-6057

Response to Jai Crapalla

JC-1: Your support for the “Citizen’s Alternative” is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

JC-2: We do not agree with your comment that the preferred alternative would not help small-scale timber operators. As explained in the DEIS on page 2-8, the Forest would have the flexibility of offering large or small sales.

JC-3: Timber would not be sold at a loss, the sale would only be offered when timber prices rise enough to make the sale or sales economical.

JC-4: As you state, all alternatives include expanding the old growth reserve and the preferred alternative would not build roads or harvest timber in the roadless area.

Hi,

I'd like to submit these comments on the proposed sale.

1. I tried to locate the text of the DEIS on the Federal Register site but all of my searches came up empty. It would be helpful if your news releases provided a document identifier to facilitate the FR search.

BD-1

2. I and my family use the Point Couverden area extensively for recreation purposes. We camp there, we fish there, and we kayak there. It's one of the more accessible areas within the Juneau boating area that has protected anchorages and good beach camping sites. Swanson Harbor, with the state float is also one of the most popular boating destinations in the area. I don't know what the proposed boundaries of the timber sale are, but I would be strongly opposed to any activities that would adversely impact any of the islands at Point Couverden, or in the near vicinity of Swanson Harbor or the other protected harbors at the point.

BD-2

Thank you,
Bob Deering
PO Box 22891
Juneau, AK 99802
(907) 790-2947

Response to Bob Deering

BD-1: The DEIS was published in Volume 69, No. 30 of the Federal Register on Friday, February 13, 2004. It was listed as: EIS No. 040063.

BD-2: No National Forest timber harvest is proposed on the islands. Except for a small portion of Couverden Island, they are State and private lands. The closest proposed harvest unit is approximately 2 miles from Swanson Harbor.

I am very opposed to any logging around the portals of the Glacier Bay National Park. The visual impact of logging is very disturbing and is not what we are here to see. The few jobs created are not worth the loss of habitat and esthetics. Larry DePute

LP#1-1

Response to Larry DePute #1

LP#1-1: No logging is proposed “around the portals of Glacier Bay”, the proposed harvest is approximately 20 miles from the entrance to Glacier Bay. All alternatives meet the visual quality objectives for the area; most units would not be noticeable to people sailing through Icy Strait. Refer to the Scenery section for a discussion of the effects on scenery, including photos that estimate how the area would appear from key viewing areas following harvest.

Larry DePute - 2

Family Practice Physicians

10301 GLACIER HIGHWAY • JUNEAU, ALASKA 99801
(907) 789-2910

WILLIAM M. COLE, M.D.
LARRY DEPUTE, P.A.-C.
ANGELA HIND, M.D.
JULIE MCCORMICK, M.D.
ALEX MALTER, M.D.
ERIC OLSEN, M.D.
KIM C. SMITH, M.D.

Supervisors Office
Tongass National Forest
648 Mission Street
Ketchikan, AK 99901

DEAR SIR,

I would like to oppose
any consideration of logging
in the Pt Couverdon AREA.
This is the gateway to
a National Park. Logging
would cause a visual
blemish to the beauty
that hundreds of thousands

LP#2-1

of people come to see.
Please leave something
to enjoy.

J. D. H.

ldepote@gci.net

Response to Larry DePute #2

LP#2-1: Please see the response Larry DePute #1

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On Monday, March 22, 2004, I received a phone call from Larry Edwards in Sitka (747-7557). H stated that the acres for Alternative 6 in Table 2.6 (172 acres) did not agree with the sum of the acres on the Unit Cards for Alternative 6 (99 acres).

I reviewed the DEIS and found that Alternative 6 had been left off the Unit Card for Unit Number H32. Unit H32 is part of Alternative 6 as shown on Figure 2-6.

I notified Mr. Edwards of the error.

Dave

Dave Carr, TMA & DFMO
Juneau Ranger District
Tongass National Forest
907-790-7402
e-mail: decarr@fs.fed.us

LE-1

Response to Larry Edwards

LE-1: Thank you for pointing out that one unit card is missing. The unit card for H32 indicated that it applied to Alternatives 2, 3, and 4. It should have noted that it also applied to Alternative 6. This has been corrected in the FEIS.

GREENPEACE

Sitka Field Office
Box 6484 Sitka, Ak 99835
907-747-7557

March 29, 2004

Couverden Timber Sales Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, Ak 99801-8041
Fax: 907-586-8808

Hello,

Our comments on the Couverden Timber Sales Draft EIS are attached.

Please send us copies of all comments received on this project, and also a copy of your responses to the comments.

Sincerely,



Larry Edwards
Forest Campaigner

By Fax:
6 PAGES FOLLOW.



Sitka Field Office
Box 6484 Sitka, Ak 99835
907-747-7557

Comments on the Couverden Timber Sale Draft EIS

March 29, 2004

We applaud the consideration of project effects on wildlife habitat as a significant issue. Nonetheless, the analyses of effects on wildlife habitat are deeply flawed, and a Supplemental DEIS is required in order to provide a full and fair NEPA process.

Biological Diversity

NEPA requires that in a draft EIS "the agency shall make every effort to disclose and discuss at appropriate points in the draft statement all major points of view on the environmental impacts of the alternatives." [40 CFR 1502.9(a)] The Couverden DEIS fails this obligation with respect to the issue of biological diversity. On page 3-22 the DEIS refers to the Forest Plan's "system of Old-growth Habitat Reserves that is intended to preserve the integrity of the old-growth ecosystem on the Tongass." This disregards the major point of view that the Forest Plan's reserve system strategy is inadequate to provide that integrity. Scientists who participated in a peer review of the strategy have soundly criticized its implementation in the Forest Plan, through "Joint Statements" issued in October 1996 and September 1997 (those dates being before and after adoption of the revised Forest Plan).

Wildlife habitat has been identified as a significant issue for this project. Biological diversity is a key part of that issue. The Joint Statement scientists present what can only be characterized as a major point of view. The Joint Statement issues have not been resolved at a higher level than this project, and have continued beyond adoption of the Forest Plan. Therefore this project was duty bound under NEPA to discuss the issue of alleged inadequacy of the Forest Plan's biodiversity strategy, as it relates to this project. Accordingly, a Supplemental DEIS must be prepared to disclose and discuss the issue.

Analysis of the Significant Issue "Wildlife Habitat" Is Invalid

Concerning wildlife habitat, preparers of the DEIS did not adequately understand key terminology and the applicability of various data sources for the fundamental analyses. As a result, much of the section on wildlife habitat is erroneous, and much of the rest of it is confusing at best and very likely is also erroneous.

The difficulty that tripped up the planning team is not unique to this project. It lies in the multiple uses that various specialists (silviculturalists, biologists, forest statisticians, and forest advocates) have created for the word "volume." The multiple meanings for "volume" and the attendant confusion carry over into the two major forest-type datasets, TimTyp and Volume-Strata.

Because TimTyp was originally intended to classify the timber density of the forest, as measured in timber volume per acre, it uses the term Volume Class in the names of its various forest classes. Biologists learned empirically that the TimTyp classifications were good classifications for the varying quality of old-growth wildlife habitat across the forest, so the biologists (and forest advocates) have appropriated the "volume class" terminology for describing habitat. Unfortunately, it was later determined that TimTyp's Volume Class classifications are not indicators of timber volume after all. It has been verified, however, that the classifications do indeed correlate well to habitat quality. Accordingly, biologists and forest advocates have continued to use volume class terminology (and related terms such as high volume) to describe habitat.

After it was determined that Volume Class is not an indicator of timber volume, the Forest Service developed the Volume Strata dataset. ~~It has~~ been confirmed that this newer dataset represents geographic variations in per se timber volume well; however, it has also been shown that Volume Strata does not represent such variations in wildlife habitat.

We therefore have two datasets with distinct and mutually exclusive uses: TimTyp's volume classes as indicators of habitat quality, and the newer dataset's volume stratas as an indicator of timber density. Both datasets use "volume" terminology, whether appropriate to each dataset's purpose or not.

Accordingly, like many words in the English language, "volume" has taken on a dual meaning. When, for example, "high volume" forest is spoken of, it must be made clear explicitly or through strong context which sense of the term is being used. Is it referring to a high per se volume of timber per acre, or does "high volume" really mean high quality habitat, as indicated by TimTyp? With this confusion always present with the term "volume," it is especially important to verify that the correct dataset – TimTyp – is being used for analysis of wildlife issues. Also, keep in mind (as when reviewing comments on this DEIS) that when biologists and forest advocates say "volume," they almost always are speaking of habitat structure as represented by TimTyp, not per se timber volume.

G-2
cont.

(For information on which dataset is suitable which purpose, see these references: "Deconstructing the Timber Volume Paradigm in Management of the Tongass National Forest," John P. Caouette, et al., March 2000 and "Forest Management Volume Classification -- Volume Class and Volume Strata," by Bill Wilson (R-10), September 27, 2002.)

Terminology Used in Our Comments

In order to avoid entirely the above-described confusion over the term "volume," we use the following terminology in our comments:

We use **Structure Class** in place of volume class. The new term suggests a delineation of habitat quality that correlates to forest canopy structure, which is what the underlying TimTyp data is known to portray. This table shows the names we use for the several TimTyp forest classes:

<u>New Terminology</u>	<u>Old Terminology</u>	<u>TimTyp Map Color</u>
Structure Class A	Volume Class 7	Darkest Green
Structure Class B	Volume Class 6	Dark Green
Structure Class C	Volume Class 5	Light Green
Structure Class D	Volume Class 4	Lightest Green

Structure Class E Scrub Timber Yellow
 Structure Class F Non-forest White

We use **Yield Class** in place of volume strata. This new term suggests the scaled volume of timber that a plot can be expected to yield, if clearcut. Yield classes would be high, medium and low, just as in the existing volume strata terminology. Volume strata and volume class are often confused because of their common word, so both terms should be replaced with distinctive ones, like those suggested here.

Fundamental Errors in the Wildlife Habitat Section

In the Chapter 3 section on Wildlife Habitat, the Draft EIS makes frequent use of the Yield Class (i.e. Volume Strata) dataset and of the term volume strata. All of these references and uses are wholly inappropriate. As explained above, Structure Class data should have been used exclusively. Accordingly, the attempted analysis of impacts to wildlife habitat is not only meaningless, it is dangerous because it is entirely possible that the analysis masks impacts which are substantially greater than the levels of impact it predicts. All parts of the Wildlife Habitat section that rely on Yield Class data must be re-analysed and rewritten.

G-2
(cont.)

The error committed in the DEIS' habitat analysis is a fundamental one, that strikes at the heart of the adequacy of the NEPA analysis done in this DEIS. We believe it is beyond any question, given the importance of wildlife habitat issues for the project, that a Supplemental DEIS is required in order to fulfill the purposes of NEPA.

Further, the fundamental error leads us to question whether the Couverden Timber Sales Project leadership and biological staff have the necessary professional experience in this bioregion to conduct a NEPA analysis that fully and fairly assesses the impacts of the alternatives.

Rampant Confusion in the Wildlife Habitat Section

The Wildlife Habitat section makes frequent use of the vague term "high-volume old-growth," which could refer to either the Volume Strata or TimTyp (volume class) dataset. Use of this vague language makes understanding the DEIS text impossible.

In all cases, where the reference in the DEIS is not to high-value habitat as indicated by TimTyp (i.e. high Structure Class), reanalysis using the correct dataset is necessary. In addition to using the correct dataset (TimTyp), if the term "high volume" is used it should be made explicit that the reference is to TimTyp, in order to avoid any confusion. Better yet, the term high volume should be replaced with a clear term such as "high structure class."

G-3

Confusion over the datasets and the multiple terms that use the word "volume" is apparent in Tables 3-5 and 3-17. These tables attempt to incorporate both Structure Class (volume class) and Yield Class (volume strata) data. As a result the tables are indigestible, but more importantly whatever value they may have is obscured by the Yield Class data, which is meaningless in habitat analysis. These tables need to be simplified by eliminating all reference to Yield Class data, and analysis needs to be based entirely on Structure Class data.

Fragmentation

The patch size analysis looked only at "medium and high volume" productive old growth forest. (p.3-27) The quoted term indicates that Yield Class (volume strata) data was used in the analysis. Structure Class (TimTyp) data should have been used, to look especially at the fragmentation of blocks containing high structure class stands.

G-4

The subsection on effects merely cites basic statistics, and compares the alternatives only on that basis. There is no real analysis of effects. What effects can be expected from this fragmentation on the quality of the habitat, and on wildlife populations? The DEIS does not say. In addition, this must be a cumulative impacts analysis that includes prior logging in the project area.

G-5

Marten

Page 3-41 says: "Coarse canopy structure comprises 20 percent of the high-volume old-growth and three percent of the total project area." The sentence is meaningless, pointlessly comparing habitat structure to timber inventory. The important questions are not addressed: (1) How much of the existing coarse canopy forest will be taken and (2) Cumulatively, how much of the original coarse canopy forest will have been taken?

G-6

The map of marten habitat (Figure 3-2) needs to be discussed in the text, habitat-block by habitat-block, for high and medium value marten habitat. There needs to be an additional map showing where high, medium and low value marten habitat was located prior to earlier logging. Both maps need to include the Huna-Totem Corporation over-selection (see map, Fig. 1-3), and an estimate needs to be made of the cumulative effect on marten habitat suitability if the land is conveyed to Huna-Totem and it is logged (considering also the effects of this project and the prior logging).

G-7

Page 3-41 also says: "... the amount of suitable habitat proposed for harvest is small. Less than 9 percent of the total high-volume old-growth" under 1500 feet in elevation would be removed. There are two problems with this statement. It looks only at the immediate impacts of this project - not at the cumulative impacts including previous logging. Also, it speaks of apples and oranges - marten habitat versus per se timber volume.

G-8

Deer

As in the marten discussion above, a map is needed in addition to Figure 3-3, to show the extent of high and medium value deer habitat that existed prior to previous logging. The Huna-Totem over-selection needs to be included on these maps, and needs to be part of a full cumulative impact analysis for deer and deer habitat capability.

G-9

The DEIS notes little high quality deer habitat in the project area and low deer populations. This does not justify picking away more of what good deer habitat there is here. The DEIS also notes that the beach fringe is presently protected, a fact which could be undermined by the above over-selection. The DEIS notes (p.3-58): "Historically, this area probably did not support a large deer population due to extreme winter conditions." This then is an area that should not be pushed to the edge for deer and wolves by further logging that takes much of the remaining good habitat.

G-10

The DEIS notes also: "Proposed pre-commercial thinning of some older harvest units may improve forage for deer in the short term." (p.3-58) This should be stricken. Summer forage is not the limiting factor; as noted one sentence earlier, winter conditions are the limiting factor. Pre-commercial thinning is not an effective way to create winter habitat.

G-11

The deer model is cited as "a reliable" comparison tool. (p.3-46) We believe that over-reliance on the deer model is not justified, and that an additional, non-modeling means of analysis needs to be employed. We incorporate here by reference the Sitka Conservation Society comments on the Otter Lake DEIS, which criticize misuse of the deer panel convened during preparation of the Forest Plan. See also Kiester and Eckhardt, 1994, "Review of wildlife management and conservation biology on the Tongass National Forest: a synthesis with recommendations. USDA Forest Service report," especially the critiques of modeling by the individual reviewing scientists. Please include both documents in the planning record, and study them.

G-12

Wolves

Wolves live in the project area. A full and fair analysis of impacts to their major prey, deer, is essential.

G-13

Marbled Murrelet

This section contains a confused analysis that compares Structure Class (volume class) and Yield Class (volume strata) data; a pointless exercise. The project area should simply be mapped by Structure Class, and the analysis should proceed from that and the underlying data.

The Effects subsection begins with reliance on Yield Class data (e.g. in Table 3-5), which is not germane to the issue of impacts to murrelets.

G-14

In the Cumulative Impacts section (p.3-57), the DEIS says: "For the marbled murrelet, harvest of medium- and high-volume POG would result in additional decreases in the amount of nesting habitat." Again, this is looking only at Yield Class data - the wrong dataset.

There needs to be a cumulative impact estimate for how much of the original (before prior logging) Marbled murrelet habitat will have been lost. Fragmentation and patch size is mentioned, but the fragmentation analysis elsewhere in the DEIS is inadequate, and a specialized fragmentation analysis may be need for Marbled murrelets in any case.

G-15

Marbled murrelets deserve greater attention in the DEIS because of the project area's proximity to a significant feeding area for the species, in Icy Strait.

Incomplete Analysis of Cumulative Effects on Wildlife Habitat

The DEIS says: "... 2,163 acres of POG has been removed, much of it being high-volume stands harvested from lower elevation sites. This represents a 9 percent reduction. Up to 981 acres (4 percent) of POG could be removed under the proposed alternatives." (3-56) We are shocked that the major summary of project cumulative impacts looks not at habitat structure (TimTyp structure class) but instead at per se timber volume.

G-16

Response to Larry Edwards, Greenpeace

G-1: The Forest's old-growth reserve system is part of a biodiversity strategy that includes many factors besides the old-growth reserves. The entire range of the Forest Plan's standards and guidelines make up this strategy. Implementation of the Forest Plan received a no jeopardy opinion from the regulatory services. The DEIS is not required to re-analyze the Forest Plan strategy for maintaining biodiversity. Alternative strategies were considered during the development of the Forest Plan. The relative merits of the Forest's strategy vs. other possible strategies are beyond the scope of this analysis.

G-2: The Forest Service is aware of the difference between the TimTyp and Timber Volume Strata. Your interpretation of the uses of these measures is interesting but incomplete. The measures used for the analysis of old growth habitat include information from both databases. TimTyp volume classes 6 and 7 are useful measurements for some habitat components provided by old growth. For example, "Volume class 6 and 7 have been identified as important habitat for such species as marten and marbled murrelets, as well as providing winter cover for Sitka black-tailed deer." (page 3-25 of the DEIS). The DEIS also uses high-, medium-, and low-volume productive old-growth forest as measures. These forest "strata" are based on more than just timber volume as your comment suggests. They are based on a combination of "soil, volume class, slope, and GIS coverages" (page 3-23 of the DEIS). These strata are described on pages 3-23 to 3-24. They are standard measures for analyzing old-growth habitat and have been used (by the author and others) for several years. You are incorrect in concluding the use of these measures indicate that the author of the wildlife analysis lacks the professional experience in this bioregion to conduct a NEPA analysis. The author has been the lead wildlife biologist on several projects on the Tongass, including two large timber sales, the SEIS to the Forest Plan, the Forest-level roads analysis, the Swan Lake-Lake Tyee power line implementation and monitoring, and a mining EIS. In addition, the Forest wildlife biologist and other biologists from the Tongass reviewed his work.

G-3: Please refer to the above explanation of the term "high-volume old growth" and the sections of the DEIS noted above to clarify the meaning of the term.

G-4: The use of medium- and high-volume productive old growth was appropriate for the patch analysis because these two categories incorporate all areas with coarse canopy (high structure) habitat (i.e., volume class 6 and 7). Additional discussion on low-volume old growth has been added to the FEIS. Also, please refer to G-2.

G-5: The section on fragmentation uses the patch size analysis to show how the proposed alternatives would (or would not) contribute to fragmentation. The effects on individual species and groups of species are discussed under the appropriate headings. The cumulative effects of past and proposed harvests are discussed in the cumulative effects subsection at the end of the chapter.

G-6: Your question: "How much coarse canopy forest will be taken" is answered on page 3-42 of the DEIS: "Alternative 2 would remove 60 acres...Alternative 3 (48 acres)..." Your question: "Cumulatively, how much of the original coarse canopy forest will have been taken?" is not answered here because this subsection deals with direct and indirect effects of the proposed actions. Cumulative effects are addressed on pages 3-55 to 3-59. The exact number of acres of coarse canopy forest harvested since 1979 is not known because this measure was not identified until after these harvests occurred. The cumulative effects analysis uses an estimate of productive old growth harvested as a measure. Also see our response to G-7 below.

G-7: The actual acres harvested since 1979 that were high-value, medium-value, and low-value habitat is not known. One could reasonably assume that most of the harvested areas were high- and medium-value, but the exact amount of each is not known. It appears that

some low-value habitat was mixed in with the high- and medium-value based on soils. The cumulative effects section used an estimate of the combined medium- and high-value habitat as our best guess (Table 3-21 in the DEIS). We believe that this is a reasonable approximation of the marten habitat harvested by past and proposed timber harvests in the project area.

G-8: See the response to G-6.

G-9: See the response to G-7.

G-10: The analysis indicates that the proposed harvest would have little effect on the deer population. Refer to Table 3-16 of the FEIS.

G-11: Precommercial thinning will improve summer forage and it is likely to provide more forage during portions of the winter than un-thinned stands of the same age. As stated in the DEIS, high quality winter habitat is the most limiting habitat for Sitka black-tailed deer; however, Hanley et al. and others note that spring and summer forage areas are also important.

G-12: The FEIS states that the deer model is a useful tool. We do not agree that the deer model is over used.

G-13: Wolves do use the project area as part of a larger territory. This is discussed in the Wildlife section. The analysis considered the habitat needs of wolves, including prey species. We believe that the analysis included in the EIS is appropriate.

G-14: We do not agree that the discussion of the two volume class measures was pointless or that only structure class should be used. Refer to G-2 for a discussion of the two volume measurements.

G-15: We believe that the analysis included in the EIS for marbled murrelets is appropriate.

G-16: Refer to G-2 for an explanation of the measures used in this analysis (POG rather than TimTyp) and the reasons for their use.

Fax 907-586-8808

From: Carolyn Elder <carobill@gustavus.ak.us>
Date: Mon Mar 29, 2004 10:04:33 AM America/Anchorage
To: alaska-tongass-juneau@fs.fed.us
Subject: Couverden Timber Sale

From: Carolyn Elder, P.O. Box 225, Gustavus, AK 99826

Dear U.S. Forest Service Planners:

Thank you for the opportunity to comment on this sale. Offering a timber sale that, by your own admission, is not economically viable seems like poor planning, a waste of taxpayer money and an unnecessary burden on all the Forest Service watchdogs who have to take time to argue with you. I would ask that you cancel the planning process. Your proposal to build 3.4 miles of new roads through the wilderness and clearcut 20 million board feet of marginal timber that no one seems to want strikes me as a bad idea. The renewed pressure to "get out the cut" in Southeast Alaska has many of us very concerned. Public hearings once allowed us to express our objections for the record, while we weighed our concerns against those of our neighbors in a public arena. What has happened?

I am most concerned with aesthetic values. I wince every time I look up at the clearcuts--clearly visible from Gustavus--from the previous disastrous Couverden sale. While you have made some effort in the current DEIS to address aesthetic concerns, you do not address the visual impact from the air. Put yourselves in the shoes of a visitor, departing Juneau by air for perhaps a once-in-a-lifetime visit to Glacier Bay, one of the world's premier wilderness areas. Imagine their excitement--escaping civilization, discovering wilderness--turning to bewilderment or shock as they pass over an area of such devastation. It doesn't seem to me that you have anywhere calculated the value of these trees standing. They have value above and beyond the stumpage fees they could command. Where does this enter your planning?

The clearcuts already there will eventually recover, but if more are allowed now, we lose hope of ever getting to a sustainable situation. If cutting is to be allowed, I favor alternative 5, which will preserve the remaining aesthetics of the area and provide sustainable economic opportunities for local residents. It makes sense, it works within the existing road network, it fits with the country, it is respectful of all our values. I object to the current emphasis on clear-cutting and road-building. Again, thank you for the opportunity to comment. Carolyn Elder

CE-1

CE-2

CE-3

CE-4

CE-5

CE-6

Response to Carolyn Elder

CE-1: Under the Tongass Timber Reform Act, the Forest is required to seek to meet market demand. The Forest prepared this analysis as part of our efforts to comply with this requirement. This sale would only be offered when timber prices rise enough to make the sale economical.

CE-2: No harvest or road building is proposed in any wilderness. The Couverden project area includes a well-developed road system, several bridges, and many areas that were harvested from 1979 to 1993. Only minor extensions of the existing road system are proposed. All alternatives other than Alternative 2 avoid any extension of a road into a roadless or unroaded area. Please refer to the discussion of Issue 1 in Chapter 3 of the EIS.

CE-3: We do not agree that public hearings are needed to allow the public to express objections for the record. We believe that written comments provide a better format for gathering public input. There is no chance that the person commenting will be misquoted. Their exact words are published in the FEIS along with the agency response. The open house format offers a chance for all participants to review information and ask questions about the project. This enables each person to spend however much time they wish providing comments, rather than restricting each person to a brief time period in a hearing.

CE-4: You are correct that the DEIS does not address the visual impact from the air. As per Forest Plan direction, visual effects are analyzed from key viewing areas (KVAs). These are described and discussed in the Scenery section of the DEIS. Refer to page 3-196 of the FEIS for the Forest Plan for a discussion of why airplane routes are not considered priority travel routes or KVAs.

CE-5: The value of standing trees for wildlife habitat, scenery, and other resources are considered, but no dollar value has been identified.

CE-6: Your support for Alternative 5 if any cutting is allowed is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

Response to Page Else, Sitka Conservation Society:

See Mark Rorick, Sierra Club (joint letter)

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Written Comment Sheet
Public Meeting for the Couverden Timber Sales DEIS

John E. Erickson

Thank you for your input.

Date: 3-17-04

PLEASE PRINT:

AS A Guide And Outfitter I
would prefer to see NO
Logging AT ALL in The Couverden
area. This is one of My Guiding
Area's and Important to My
income and The people hire to
Guide for me, Their income also
My 2nd choice would be
Act #15 The Gustav's proposal
This ~~small~~ scale type of
Operation would have less
Impact on the area - For Recreational
& Commercial Hunting & fishing use
Logging is A Here Today gone
Tomorrow Industry, And Leaves The Area
A mess for years to come, The people
it employs are gone too, And The Locals
Have to live with The mess. This type
of Industry creates nothing positive
(over)

JEE-1

JEE-2

JEE-3

NAME:	
ORGANIZATION:	
E-MAIL ADDRESS:	
MAILING ADDRESS/CITY/ST:	

Names and addresses will be added to the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

Comments may be mailed to:

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

As This Sale and The Previous
Sales in the Couverden Timber Sale
area ARE MONEY LOSERS FOR THE FOREST
SERVICE and THE TAX payers "The Bottom Line"
it seems to me with all the expertise
The Forest Service is spending TAX dollars
to employ, This Brain Trust. Could
think of Better ways to Utilize the
Tongass Forest, That after all, Belongs
to ALL American's - I know that
Money Lasing endeavors is a Government
way of life - The Forest Service should
consider the people that's Tax dollar
is Footing the Bill and come to
their senses - I AM SURE private
ENTERPRISSE could, They would HAVE TO
OR They would Be out of BUSINESS.

SEE-:
CONT

Response to John E. Erickson, Tok River Outfitters

JEE-1: Your support of Alternative 1 is noted.

JEE-2: Your support of Alternative 5 as a second choice is noted.

JEE-3: The Forest is required under the Tongass Timber Reform Act to seek to meet market demand for timber. The Tongass Land and Resource Plan identifies LUDs where timber management is appropriate. The Couverden area contains two such LUDs. Refer to the discussion of these LUDs in Chapter 1.

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Couverden Timber Sales Comments Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

Dear Forest Service,

I appreciate the opportunity to comment on the Couverden timber sale DEIS. The current market for Tongass timber is virtually non-existent, far worse than during the last sale in 1985. I urge you to heed the DEIS text (p.2-12) stating that none of the proposed alternatives are economically viable under current market conditions. To find a bidder for this sale (which is predominantly small, low-grade hemlock) the F.S. will likely have to sell at base rates and offer an round log export permit, guaranteeing the continued loss of millions of taxpayer's money with little, if any, benefit to the local economy. Please do not act on the current proposed alternative (Alternative 3) because it is not a conscientious or defensible use of taxpayer dollars in these financially troubled times. The tourism industry, which is an important economic player icurrently will also be hurt by the proposed action.

CG-1

Instead, I urge you to manage the Tongass resources in support of truly sustainable, value-added wood products industry harvested via existing roadsystem, exemplified by Alternative 5 in the DEIS. I also request that you revise Alternative 5 to include the "in perpetuity" concept found in the original plan. Alternative 5 is the only economically viable harvest plan in the DEIS and therefore should be accepted as the FEIS preferred alternative.

CG-2

I have a few comments about the document as a whole. It cannot be helped that the subject matter is dry, but I found the DEIS writing style and organization nearly impenetrable to the average reader. If the aim was to discourage people from reading the DEIS, I am certain that you succeeded deterring many potential readers. I was also disheartened to note that the biological information you used regarding SE Alaska humpback whale population size in the Affected Environment section was quite outdated, stating that there are about 500 whales, when recent estimates determined that there are closer to 1,000 whales. Although your agency seems to summarily absolve itself of any responsibility for the effects of its actions on marine systems, it is not too much for the public to ask that you make a good faith effort to obtain current information for your NEPA documents.

CG-3

CG-4

I also want to register my objection to the new Forest Service policy that will cease holding public hearings for its actions (except ANILCA subsistence) in Alaska. These hearings are important sources of information for the public, because they provide the opportunity for those affected by and commenting on your management actions to educate each other on the effects of proposed actions. It may be technically legal for your agency to make this policy change, but it is certainly not in the spirit of NEPA, nor is it a good way for your agency to build a constituency in Alaska. It is already difficult enough for members of the public to know that the Forest Service hears and heeds our comments, and shutting down public hearings as an avenue of input is clearly a step in the wrong direction.

CG-5

Sincerely, Christine Gabriele

Response to Christine Gabriele

CG-1: Your opposition to the preferred alternative (Alternative 3) because it is not a conscientious or defensible use of taxpayer dollars is noted. This sale would not be offered until timber prices rise enough to make the sale economical.

CG-2: The Forest cannot include harvesting a given volume per year “in perpetuity.” This proposal seeks to meet direction in the current Forest Plan, which includes harvesting timber from a portion of the project area (the Timber Management and Scenic Viewshed LUDs, refer to Figure 1-2). The current Forest Plan will be revised in the future. We have no way of knowing if the Couverden area will include LUDs that permit timber harvest or what standards and guidelines may apply during the next planning period, much less over the next 100 years. Standards and guidelines have changed significantly over the past 20 years and may continue to change as new scientific information is gained.

It is not correct, as you state, that Alternative 5 is the only economically viable harvest plan. None of the proposed alternatives is economical under current market conditions. Alternative 6 is closest to viable (-\$19.9/CCF), followed by 2 (-\$46.26/CCF), 3 (-\$46.63/CCF), 5 (-\$64.74/CCF), and 4 (-\$110.36), in that order (DEIS Table 3-27).

CG-3: We regret that you found the DEIS writing style and organization “nearly impenetrable to the average reader.” The EIS follows a template developed by the Forest to meet both the legal requirements of NEPA and the need to produce a clear, readable document. We note that some readers commented that they found the DEIS informative.

CG-4: We are not aware of recently published information estimating that there are closer to 1,000 whales in Southeast Alaska. We would appreciate a copy of your reference for this information. More than 3,600 humpback whales are currently estimated to exist in the Central North Pacific stock (NMFS Stock Assessment Report 2002, revised October 30, 2001). The estimate of 300 to 500 humpback whales entering the Inside Passage during portions of the spring and summer was similar to Baker et al. (1986) estimate of 374 humpback whales for Southeast Alaska.

CG-5: The Forest has not changed its public involvement process for timber sale EISs. Holding formal hearings has not been a requirement. Public meetings can follow, and have followed, various formats. For example, informal information workshops were held for the Madan and Skipping Cow EISs several years ago to allow members of the public to ask specific questions and gather general information about the project. Formal hearings were held in Hoonah and Gustavus for subsistence issues, as required under ANILCA.

Owen Graham

Written Comment Sheet
Public Meeting for the Couverden Timber Sales DEIS

Thank you for your input.

Received
Date: Mar 16, 04

PLEASE PRINT:

Please proceed with this timber sale project.	OG-1
Our industry is desperately short of economic	
timber sales.	
	OG-2
There is good timber up the Swanson river	
drainage. Hopefully you can supplement this	
EIS with more timber in that drainage	
right away,	

****Continue on back for more space****

NAME: Owen Graham
ORGANIZATION: Alaska Forest Association
E-MAIL ADDRESS: ojgraham@aol.com
MAILING ADDRESS/CITY/STATE/ZIP: Nisitedman, Ketchikan, Ak. 99901

Names and addresses will be added to the mailing list for the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

Comments may be mailed to:

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

Response to Owen Graham, Alaska Forest Association

OG-1: Your recommendation that this timber sale be sold is noted. The sale would only be if timber prices increase enough that the sale would be economical.

OG-2: Alternative 4 includes more timber in the Swanson drainage than the other alternatives. This alternative was not the preferred alternative because of the high cost of road reconstruction that would be needed to access this area. This would include crossing three Class I streams.

Dear Forest Service Officials:

Thank you for the opportunity to comment in writing.

I am concerned about the Forest Service's decision to forgo the public hearing process in favor of an "open house." If you are really interested in hearing and incorporating public comment into your decision making process, then you should be required to provide a forum where the public can speak "on the record."

MH-1

I believe that you do not wish to hear what you already know: this sale doesn't make sense financially. Your own agency paperwork states that, "none of the proposed alternatives would be economically viable under current market conditions."

MH-2

This proposed sale is reminiscent of the Golden Fleece Award the Forest Service won in 1986 for "appropriating and spending \$51 million preparing for Alaskan timber sales which lost on average 83 cents on the dollar." Why do it again? For jobs? Your records show that Tongass timber jobs make us less than one half of one percent of employment in SE Alaska. This sale isn't financially smart. It won't improve the recreational quality of Couverden. And you'll destroy wildlife habitat in the process.

MH-3

The Couverden area is a critical viewshed for overflights, cruise ships, ferries and a key area for fishing, hunting, hiking, and boating. We are tired of "seeing" our public lands plundered at tax payer expense, on directives from ideologues in Washington.

MH-4

Months ago a perfectly good small-scale logging operation was proposed for Couverden by the people of Gustavus. It was called the "citizens alternative." Why not try it?

MH-5

Sincerely,

Melanie Heacox
P.O. Box 359
Gustavus, Alaska 99826

Response to Melanie Heacox

MH-1: We do not agree that the Forest must provide a forum for the public to speak on record in order to hear and incorporate public comments. We believe that written comments provide a better format for gathering public input. There is no chance that the person commenting will be misquoted. Their exact words are published in the FEIS along with the agency response. The open house format offers a chance for all participants to review information and ask questions about the project. This enables each person to spend however much time they wish providing comments, rather than restricting each person to a brief time period in a hearing.

MH-2: Timber would not be sold unless timber values were to increase to the point that the offered sale is economical.

MH-3: We agree that the sale is not likely to greatly improve the recreational quality of the area, but it is also not likely to adversely affect it either. The effects on wildlife habitat are also not expected to be significant. Please refer to Chapter 3 of the FEIS for a discussion of these issues.

MH-4: We agree that the area is an important viewshed. Refer to the Scenery analysis in Chapter 3 for a discussion of how possible impacts to scenery would be mitigated. Also refer to the response to CE-4.

MH-5: Your support of Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

Kevin Hood

PO Box 32202
Juneau, AK 99803-2202
March 28, 2004

Couverden Timber Sale Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

RECEIVED

MAR 29 2004

Juneau Ranger
District

Dear Forest Service Official:

I am writing to present my comments regarding the Couverden Timber Sale.

Alternative 5, the derivation of the Gustavus Citizens' Alternative is the only alternative that makes sense ecologically, economically and politically and I urge you to take a courageous stand in support of it.


The Forest Service for many years has been offering timber sales that cost the taxpayers large sums of money, timber sales that require hard-to-maintain roads, timber sales which degrade water- and viewsheds, timber sales that cannot compete with the glut of cheap timber on the international market. If you do not choose Alternative 5, you will be continuing this sorry legacy.

I understand that there are powerful forces pressuring your decision and that it is hard to ignore them. Nevertheless, I insist that if you do propose Alternative 5 this will not only be a sale that is ecologically sustainable and economically viable but also one that is politically popular. You would have the support of the local community, the native community and the environmental community. When is the last time a Forest Service timber sale had such broad appeal?

The powerful influences may not be pleased with this decision in the beginning, but I believe they would come around to appreciate it as it became evident that this is a solution for the common good. Gustavus would enjoy an indefinite timber supply, lands special to Native Alaskans would not be denuded, hunters would not be displaced, fishing grounds would be preserved, viewsheds would not be impacted and environmentalists would be pleased. Not to mention that the sale would most likely be sold.

The history of the Forest Service includes "mavericks" who bucked Agency convention in order to serve the public good. Arthur Carhart was an architect who refused to parcel up a beautiful lake because it would better serve the people retaining its pristine character. Aldo Leopold and Bob Marshall championed protecting land as Wilderness when many only saw value in extractive uses. These Forest Service employees have become legends for their foresight and activism. I urge you to act genuinely in the interest of the public and follow in their noble ways.

Thank you for considering my comments.

Sincerely,

Kevin Hood

Response to Kevin Hood

KH-1: Your support of Alternative 5 is noted. Please note that Alternative 5 does not propose to provide a perpetual timber supply earmarked for Gustavus, as the Gustavus Community Association proposed. It would make between 100,000 and 500,000 board feet of timber available per year for ten years. It is anticipated that operators from Hoonah and Gustavus would bid on small sales from the Couverden area.

Thomas Imboden

Thomas Imboden
P.O. box 214
Gustavus, Alaska 99825
March 18, 2004

Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801-8041

Re: Couverden Timber Sale

Dear Sir:

In response to the proposed timber sale at the Couverden area we would like to offer the following concerns. First the timber in question is of a poor quality, which begs the question, how will multinational companies utilize this timber. Most likely the trees harvested will be shipped out of the area (and Southeast Alaska) in the round to overseas destinations. This would provide little or no economic benefit to the region. If timber is to be cut it should and must provide economic benefits to the local economy.

TI-1

Economic benefits to the Icy Strait area would be achieved with local individuals and companies being awarded the contract(s). It is clear that local companies do not have the resources to harvest and mill tens of millions board feet of timber. However, local individuals and companies could provide the framework for sustainable management of this valuable resource on a reduced scale.

This leads into another concern, namely what is a sustainable yearly yield of timber from the Couverden area. Selective and non-clear cutting is part of the answer. The majority of the standing timber is hemlock, with other species including cedar within the target area. Smaller operations have the ability, and we would argue the desire, to selectively cut timber allowing slower growing trees to thrive and the forest to be a healthy eco-system. Old growth trees make a healthy forest and provide shelter and sustenance to the fauna, which thrive in old growth systems. We would suggest that a sustainable harvest would be one million board feet annually-to be evaluated on a periodic routine to insure legitimacy of the logging regime based on a two hundred year cycle.

TI-2

Given the above, we suggest that to foster a mature and healthy forest the scale of the proposed sale is decreased and that concerted efforts on the part of the U.S. Forest Service be directed to awarding local contracts and encouraging small local entrepreneurs to harvest a sustainable yearly harvest.

TI-3

Sincerely,



Thomas Imboden

Response to Thomas Imboden

TI-1: Generally, trees from the National Forest are not exported without primary milling in the country. In some cases, such as the large blowdown near Yakutat, an export license is obtained because there is no market for the logs locally. If a local market exists, logs would not be exported. During scoping, the mill in Hoonah said that they were interested in purchasing approximately 2 MMBF per year. There are also several local operators that are interested in purchasing 100 MBF per year. Several smaller sales extended over the decade could supply this market. It is also possible that only a small portion of the volume will be purchased. This will be determined by economic conditions and timber demand.

TI-2: The Timber Resource Report includes an analysis of even-flow, long-term sustained yield for the project area. The sustainable yearly yield of timber from the Couverden area is approximately 9 percent of the suitable volume per decade. This includes previous and proposed harvests. The base year was 1979; the year the first harvest occurred. Approximately 342 MMBF existed prior to harvest on land currently considered suitable. Approximately 46.2 MMBF has been harvested from these suitable areas. This is less than 9 percent per decade. Alternative 2 has the highest proposed harvest volume, 27.4 MMBF. This is less than 9 percent. The analysis assumes a 100-year rotation for the Timber Management LUD and a 170-year rotation for the Scenic Viewshed LUD. This analysis did not include thinning volume that may be harvested from second growth stands in the future. This information has been added to the FEIS.

Generally, small operators lack the equipment to yard logs in selective harvest except in areas close to roads. Therefore, they generally require many more roads than would be needed where larger sales allow larger equipment to be moved in and operated. Alternative 5 proposes to selectively harvest a large portion of the suitable timber within reach of existing open roads.

TI-3: The Forest Service does consider smaller sales to local entrepreneurs as part of its timber sale program. Refer to the ROD for further information on this issue.

Glen 17h

Couverden Timber Sales Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

March 28, 2004

RECEIVED

MAR 30 2004

Juneau Ranger
District

Couverden Timber Sales Comments

I would like to submit the following comments regarding the proposed Couverden Timber Sale. The Draft EIS, the Final Resource Report for Wildlife (2003), and the knowledge gained from over twenty years of working on the Tongass National Forest form the base for these comments. Most of the following comments are related to the wildlife and biological diversity resources associated with this project.

Comment #1

The patch size analysis conducted in the Forest Fragmentation section starting on page 3-27 of the DEIS should be conducted on all of the productive old-growth (POG) in the project area. If you exclude the low volume old-growth habitat component from your analysis it is suggested that there should be a very convincing argument as to why it was excluded. If low volume interior old-growth habitat is far less suitable to some old-growth associated species a discussion as to why and to what degree needs to be presented. This convincing argument is presently missing in both the DEIS and the Wildlife Resource Report.

Table 3-7 displays the various patch sizes and total number of patches within a size category. A relationship is then formed between this table (Table 3-7) and Table 3-9 with some wildlife species using optimal habitat suitability. For example, "Optimal habitat use is believed to occur when patches of preferred habitat are greater than 250 acres for the red-breasted sap sucker (USDA Forest Service 1997a)". These optimal habitat suitability relationships discussed in the Forest Plan FEIS and used in the discussion here in this DEIS were formulated using a lot of scientific uncertainty. This is why these optimal patch sizes were not used as units of measure in the 1997 Forest Plan as some sort of threshold values. There are some relationships for determining the most optimum patch sizes for deer. Look at the chart between page L-41 and L-42 in the Deer Winter Habitat Capability Model for Southeast Alaska (1993), it may help in your analysis. There has also been relevant recent literature published on the effective patch sizes for the brown creeper since the publishing of the 1997 Forest Plan. This information could be drawn upon to support the effective patch sizes used for the brown creeper in the DEIS.

In general, it is very nice to tier to Forest Plan and Forest Plan FEIS information in your project level EIS's, but unfortunately, in this case you are treading on shaky ground when using these optimal patch size relationships shown in the Forest Plan FEIS. Linking this information to your project specific patch analysis and using this optimal patch suitability

GI-1

in the following discussions on direct and indirect effects sections starting on page 3-42 is even more unfortunate.

The most suitable habitat for the red-breasted sapsucker as determined by the Habitat Capability Models for Southeast Alaska (1993) is low volume old-growth habitat because of the number of excavated cavities used as nest sites per plot by volume class. The patch analysis conducted in the DEIS totally ignores this relationship since it is specific to medium and high volume old-growth habitat. It is hard to understand why this species is used in the discussion of effects at all. If there is a present concern for this species in the project area then a discussion on effects would be necessary but this concern is not made apparent.

GI-1
cont

It is suggested here to mention that the red-breasted sapsucker was a species used in the Forest Plan revision process and that this species is found in the project area but was not used as an Management Indicator Species for this specific project. Then move on, unless this species is specifically targeted by a strange group of Juneau fly tiers resulting in a viability concern within the project area. Common targeted species in Southeast Alaska are deer because of their use as a subsistence resource, and marten because they are commonly trapped here.

Comment #2

The Cumulative Effects section beginning on page 3-55 is generally weak. There is some pertinent information on the total amounts of POG removed historically, the existing amount of POG, and the possible future conditions of POG with implementation of the action alternatives, but this information is confusing. The discussion is mostly qualitative and does not tie well into any predetermined units of measure. The Cumulative Effects section doesn't focus in an out of the project area on a temporal or spatial scale very well. This is especially important in the cumulative effects on the biological diversity resource.

It is very apparent that the cumulative impacts for this project on the wildlife and biological diversity resources was a side issue. A short discussion on cumulative impacts may be appropriate in a project area with minimal amounts of past management activities but in a project area that has already had over 2,000 acres of timber harvest activities; a more complete discussion of the cumulative effects is necessary. For instance, it is easy to see that the POG within some VCU's within the project area have been impacted to a greater extent than others, so a comparison on the historical amount of POG in each VCU with the amounts removed from each VCU (the existing condition) and amounts removed with the action alternatives would be very useful. This discussion would also be related to the loss of biological diversity (loss of old-growth habitat) in the project area. In this comparison it would be important to include all of the VCU land acres, not excluding acres that fall outside of the project area.

GI-2

Comment #3

Linked to the cumulative impacts is the discussion on concerns for wolf viability and mortality. These concerns involve looking beyond the project area to a combination of WAA's or the Biogeographical Province scale. The discussion in the DEIS only pertains to the project area.

GI-3

Comment #4

A short discussion of the old-growth conservation strategy adopted in the 1997 Forest Plan is presented in the DEIS, yet one of the most important components of this strategy is left out, that is the management of the matrix lands, which are the lands outside of reserves, small islands, and beach buffers. In the matrix lands Forest Plan S&G's for wildlife and riparian management areas are incorporated. Please include a discussion on the importance of the matrix areas in the project area for wildlife and biological diversity resources.

GI-4

Comment #5

In the discussion concerning the small Old-growth Habitat reserves on page 3-30 it is stated that interagency review by biologists from the Forest Service, ADF&G, and USFWS determined that the small OGR in VCU 1180 did not meet the appendix K criteria. In the Wildlife Resource Report it claims that the biologist review consisting of a meeting was held in 1993. The system of "Old-growth reserves" did not exist as such until after the revision of the Forest Plan published in 1997. Are you talking about the old Habitat Conservation Areas here?

GI-5

An interagency review of the small OGR's should have occurred as a result of this project. VCU's that are completely contained within or portions of VCUs within the project area should also have been reviewed regardless if management activities are taking place in these VCU's or not.. It may also be necessary to look at the Small OGR's in VCU's that are completely outside but adjacent to the project area as recommended in TPIT (1998). Please send me the completed interagency biologist review of the small OGR's for this project.

Comment #6

The term "old-growth dependent species" is used throughout the DEIS and the Wildlife resource report, specifically on pages 3-21 and 3-26. It is suggested that this term should be replaced with "old-growth associated wildlife species". There are very few wildlife species that are obligate users of old-growth habitat on the Tongass National Forest. Some wildlife species that could be suggested as being old-growth obligate users are the marbled murrelet, the brown creeper, and perhaps some raptor species, but to suggest that deer are old-growth dependent may be an inaccurate statement. There is plenty of scientific evidence that suggests that Sitka black-tailed deer may need old-growth habitat structure that functions as very critical habitat under some very harsh weather conditions

GI-6

due to deep and persisting snow conditions, but to state that this wildlife species and many others are "old-growth dependent" may be incorrect.

GI-6
Cont.

Comment #7

The maps on pages 1-5, 2-17, 2-19, 2-21, 2-23, 2-25 and 2-27 do not show any topographical features (particularly elevation contour lines) which are extremely important in this area of Southeast Alaska. Portions of some of the Old-growth Habitat LUD's are only shown on the LUD map (Figure 1-2) and not on the alternative maps. There is not a way to view the habitat types contained within the small OGR's in VCU's 1190 and 1200 since they are not on the alternative maps. VCU 1170 should be removed from the analysis since there are not any timber harvest or road building activities presented in this VCU. It is stated in Table 3-10 that "the small OGR in VCU 1170 would be revised if timber harvest is proposed in this VCU in the future". This VCU should be removed from the project area and the project area should be reduced accordingly. This is a good example of how to reduce impacts to wildlife and biological diversity resources by expanding the project area and concentrating timber harvest and road building in specific VCU's within the project area.

GI-7

It is impossible to tell from the DEIS if other options for the small OGR's were considered in lower elevations of VCU's 1190, 1200, and 1180. They may meet the land allocation requirements in Appendix K of the 1997 Forest Plan but do these small OGR's meet the intent of the old-growth conservation strategy? Do other options that may contain past managed stands and roads contain more suitable habitat for wildlife? Can existing roads be closed or obliterated and silvicultural treatments applied to managed stands to help accelerate these stands into areas that have the composition and structure necessary for some old-growth associated wildlife species?

Comment #8

The statement "The current road density in the project area is 0.5 mile per square mile, which is below the level at which marten populations have been reported to decline at a greater rate (Suring et al. 1992b)" is inaccurate. The level at which marten populations may start to decline is at 0.2 miles of road per square mile and beyond this figure a progressive decrease in marten winter habitat capability is shown leveling off at 0.6 miles of road per square mile. At 0.6 miles of road per square mile nearly 90% of the habitat capability for marten is lost due to over trapping according to the Habitat Capability Models for Wildlife in Southeast Alaska (1993). Recent telemetry studies in the Petersburg area seem to support these results.

GI-8

Comment #9

Why is the HSI value for deer grouped into three categories of quality based on a system of ranking on the forest? This is a value judgment and more description is required here to support this value judgment. The revised excel spreadsheet version of the deer winter habitat capability model developed by Eugene DeGayner should be used in this project

GI-9

area. The outputs of this model should be based upon the potential number of animals that the project area could possibly support. This can be illustrated using a hypothetical example; if the project area has the habitat capability to support 1,000 animals before any management activities took place (the historical condition) and presently supports 700 animals it would indicate a 30% reduction in habitat capability due to past management activities. With the proposed action a new habitat capability figure of 600 animals occurs resulting in a 14% reduction in the existing habitat capability and a 40% reduction in the historical habitat capability in the project area.

The deer winter habitat capability model can also be used as a tool to determine small OGR options within a particular VCU incorporating the importance of the existing matrix lands. For example, if the existing small OGR is presently 16% of the land area of the VCU yet contains only 10% of the winter deer habitat capability of the entire project area then this OGR might not be placed in the best position for deer habitat capability as identified in appendix K of the Forest Plan. If an OGR option is designed in the same VCU that contains 16% of the land area yet contains 50% of the entire VCU's habitat capability for deer but also contains 300 acres of managed stands and 3 miles of road then this is a viable small OGR option and relates well with appendix K criteria for deer habitat capability and should be presented to the IDT and deciding officer for discussion and possible selection. This is related to comment #7 above.

GI-9
cont.

Summary

The wildlife and biological diversity resource information presently displayed in the Couverden Timber Sales DEIS and commented upon here does not give adequate and correct information to the public. The DEIS does not disclose all of the direct, indirect, and cumulative effects of this proposal on these resources. The information presented is currently inadequate to the degree that an informed decision on this project would seem to be impossible without corrections. Thank you for the opportunity to comment on this proposal.



Glen Ith
Box 1612
Petersburg, Ak 99833

Response to Glen Ith

GI-1: Additional information on the patch size analysis has been added to the FEIS.

GI-2: We do not agree that the cumulative effects section is generally weak; however, the cumulative loss of POG per VCU has been added to the FEIS, as requested.

GI-3: Considering the cumulative loss of habitat in such a large area as the biogeographical province only serves to demonstrate that the proposed alternatives would have only a very minor impact because the proposed harvest under any of the alternatives would affect a very tiny portion the province, or of the POG in the province. The biogeographical province includes a large national park, a wilderness, and other protected areas. There are nearly 664,000 acres in the biogeographical province, approximately 155,000 acres of which are POG (refer to page 19 of the Wildlife Resource Report).

GI-4: A discussion of the role that the matrix lands play in the Forest's conservation strategy has been added to the FEIS, as you suggested.

GI-5: The interagency review of the old-growth reserve in VCU 1180 was completed in 2003, not 1993. The date in the resource report is a typo. The interagency review was completed in conjunction with this project. Please see the discussion on page 3-30 of the DEIS.

GI-6: You are correct; there are few Tongass species that are old-growth dependent. The term "old-growth dependent species" has been changed to "old-growth associated species" in the FEIS, as you suggested.

GI-7: Many maps do not show contour lines because there is a limit to how much information can be presented on a map before it becomes so "busy" that it can no longer be read. Detailed maps are shown for each proposed unit that do include 10-foot contour lines, stream class, stream buffers, and other features at a scale that permits the reader to distinguish them. These maps are displayed in Appendix B of the DEIS. A portion of VCU 1170 was included in the project area because it contains LUDs that are suitable for timber management and these LUDs are contiguous with the land considered for harvest in the other VCUs. This part of the south Chilkat Peninsula forms a natural area for consideration for harvest at this time. The IDT decided not to extend the existing road the short distance into this VCU at this time, but we believe that the current project area boundary is reasonable.

GI-8: Thank you for your clarification about the effects of roads on marten. This information has been added to the FEIS.

GI-9: The current version of the deer model was used to determine the effects on deer and to help identify which areas should be included in the small old-growth reserve. This is the model developed by Eugene DeGayner that you suggested we use. Please note that all action alternatives would enlarge the existing old-growth reserve in VCU 1180 based on interagency recommendations. The proposed old-growth reserve does not contain any roads or harvested areas.

March 8, 2004

Supervisor's Office
Tongass National Forest

Re: Timber sale on the Chilkat Peninsula

To Whom It May Concern:

I was surprised to read the article in the Juneau Empire regarding this timber sale. I live in Juneau and recreate in and around the Chilkat Peninsula. The Point Couverden area is utilized by a significant number of Northern Southeast residents for commercial fishing and recreation. Articles we have read in the Juneau Empire and news casts on KTOO indicate that the volume and quality of the timber being offered is of such low value that it is uneconomical for the small mill owners perceived by USFS as potential buyers of the sale. Any timber logging in this area is detrimental to my enjoyment of the natural beauty and environment. My family has only begun to enjoy the environment surrounding the Chilkat Peninsula. To see our recreational use and the beauty of this area degraded by logging for little or no positive economic gain is senseless.

CMJ-1

I grew up with logging and it's consequences in Colorado. I remember seeing the land stripped bare and the old stack saw mills with the air pollutants. I realize we are a long way from those days (just 34 small years ago) however, my understanding is that timber sales on the Tongass National Forest lose money and undoubtedly harm the environment.

CMJ-2

Please consider this a strong objection to this timber sale.

Sincerely,

Catherine M. Johnson
4507 Rosedale St.
Juneau, AK 99801

Response to Catherine M. Johnson

CMJ-1: Your statement that any timber logging in this area is detrimental to your enjoyment of the natural beauty and environment is noted.

CMJ-2: Timber would not be sold unless timber values were to increase to the point that the offered sale is economical.

Jason Jones

Po Box 149
Skagway, AK
99840

March 18th 2004

Juneau Ranger District
8465 Old Dairy Rd
Juneau, AK
99801-8041

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MAR 22 2004

Juneau Ranger
District

Dear Juneau Ranger District,

This is a letter concerning the Couverden Timber Sales. I have read the Environmental Impact Statement for the proposed project and I would like to first say that I am against any new logging in the Tongass National Forest. So that would put me in support of Alternative One, no action.

JJ-1

These projects in the past have cost taxpayers millions of dollars and I don't see the justification in making these mistakes again. Logging in these wild areas is environmentally destructive as well. Also being that tourism plays such a large role in south east Alaska's economy, how can such an eyesore between Juneau and Glacier Bay, which thousands of people travel to and from, be supportable?

JJ-2

For a harvest yield of twenty million board feet of timber, this has me wondering who is really reaping the benefits of helping to destroy some of the last parts of our pristine wilderness.

JJ-3

The EIS is very informative and is the main source for me forming my opinion on this project. Once again I am against any new logging in the Tongass and support Alternative One in the EIS, no action.

JJ-4

Thank you for your time and I look forward to hearing your response.

Sincerely,


Jason Jones

Response to Jason Jones

JJ-1: Your support of Alternative 1 is noted. Alternative 1 would not meet the Purpose and Need for the project, as stated in Chapter 1 of the EIS. Alternative 1 would not manage the timber resource on suitable timber lands for production of saw timber and other wood products, it would not contribute to meeting the annual market demand for Tongass National Forest timber (including the needs of the local community), provide opportunities for resource uses that contribute to the local and regional economies, or support a wide range of natural-resource employment opportunities within Southeast Alaska.

JJ-2: Your comments about the loss of money, the destruction of wild areas, and the importance of tourism are noted.

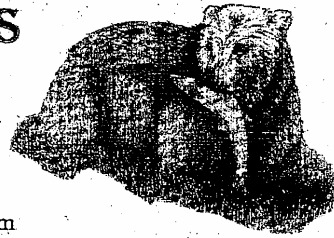
JJ-3: The proposed units are in a roaded area. They are not in or near a wilderness. Please note that Alternative 2 includes a small amount of area within the inventoried roadless area, (19 acres) but the other alternatives, including the preferred alternative, do not.

JJ-4: We are pleased to read that you found the DEIS informative.

BEAR CREEK OUTFITTERS

FLY FISHING GUIDE SERVICE

9723 Trappers Lane Juneau, Alaska 99801
(907) 789-3914 phone/fax info@flyfishsoutheast.com



March 29, 2004

Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801
Fax 586.8808

RE: Couverden Proposed Timber Sale

Dear USFS,

As a special use permit holder for the anadromous streams located in the Couverden Timber Sale Area, I support the citizen's alternative developed by the community of Gustavus. This alternative best balances the needs of local guides and recreationalists with those of small-scale timber operators and excludes neither. I urge you to select this alternative.

Thanks,

A handwritten signature in cursive script, appearing to read "Mark Kaelke".

Mark Kaelke

RECEIVED

MAR 2004

Juneau Ranger
District

MK-1

Response to Mark Kaelke

MK-1: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

Couverden Timber Sales Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Rd.
Juneau, AK 99801-8041
comments-alaska-tongass-juneau@fs.fed.us

March 29, 2004

Dear Project Leader:

The Forest Service has recognized that no Forest Service program carries with it more potential for the environmental degradation of soil, water, and visual resources than does road building (USDA Forest Service 1973). The cumulative effect of habitat fragmentation, stream sedimentation, road kills, and the stimulation of further development and resulting habitat destruction makes roads a leading threat to biodiversity (Noss 1994). Maximizing the biological potential of Couverden and allowing timber harvest is best met by Alternative 5. This alternative will not build additional roads and would not re-open closed roads within the project area.

CK-1

Alternative 5 allows timber harvest to occur over 10 years. This spreads out impacts over a long period and avoids the impact from heavy use that would occur with other harvest proposals. This alternative was proposed by the citizens that would be most impacted by this timber sale. The citizens of Gustavus has devised a proposal that will keep a few small-scale local loggers supplied with timber indefinitely while maintaining the character and habitat values of the Couverden area

CK-2

I encourage the Forest Service to be responsive and responsible to the citizens that are concern for the character, habitat, and use of the Couverden area by adopting Alternative 5 as the preferred alternative.

Thank you for your consideration of my comments.

Sincerely Yours,



Chris Kent
P.O. Box 20571
Juneau, AK 99802-0571

Response to Chris Kent

CK-1: Your comments on the Forest Service's timber sale program are noted.

CK-2: Your support of Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

Margaret Leibowitz

3-28-04

To: ~~Forest Service~~

Re: DEIS, Couverden

Alternative 5,

Gustavus Citizens'
Alternative

We are sorry to be so late in submitting
our urging that you give full attention
and agreement to the plans discussed
in the enclosed (2) letters regarding
the Gustavus Citizens' Plan.

Sincerely
Margaret Leibowitz
by Leibowitz

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MAR 29 2004

Response to Margaret Leibowitz

ML-1: Your support for Alternative 5 and the attached newspaper articles written by Paul Barnes and Russell Heath in support of that alternative are noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

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MAR 29 2004

Juneau Ranger
District

March 27, 2004

Dear Forest Service Managers,

I am writing comments regarding the Draft EIS for the Couverden Timber Sale in the Juneau Ranger District.

I am disappointed with the proposed action alternative 3 because of the large acreage of clearcuts and miles of new roads proposed. 561 acres of new clearcuts with approximately 313 acres of these clearcuts visible from key viewing areas in Icy Strait, is likely to be detrimental to tourism and will be ugly to residents and visitors alike. The cost to taxpayers will likely be high compared to the income made by logging companies at today's market prices. This area, when logged previously, cost taxpayers over \$5 million and earned the USFS Proxmire's "Fleece of the Month" award. There is no reason to believe that this sale would be any different. Silver Bay Logging Inc. and Seley Family Partnerships have already reportedly said it is unlikely they would purchase this sale because the value of timber is too low. The time of large clearcuts at taxpayers expense is over, Americans are too smart and our forests ~~are~~ are too precious to be wasted like this.

A much wiser alternative is alternative 5,

crafted by the local residents of Gustavus, with long-term jobs and environmental integrity in mind. Selectively harvesting trees on a small scale over the next 10 years is a truly sustainable proposal, both for the forest and for the local economy which would receive a steady stream of income to small mill owners as well as a steady stream of wood products for local building projects. The cost to the taxpayers would be non-existent and the area would not be subjected to more unsightly clearcuts. More pristine forest will remain for deer, bear and marten, and our subsistence activities of hunting and fishing will be unimpacted.

TL-3
cont.

Alternative #5 is truly a innovative new approach to forestry that may prove to be the best alternative to our local environment and economy. The Forest Service should embrace this local proposal as an experiment to see if it works. If it does, we may begin to see the transition from welfare logging (clearcuts at taxpayer expense) to an actual sustainable forestry method that our grandchildren will inherit.

Thank you, Tania Lewis

Tania Lewis

P.O. Box 251

Gustavus AK 99826 (907) 23-4440

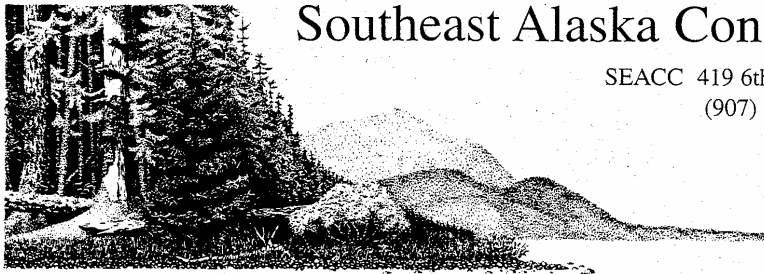
Response to Tania Lewis

TL-1: Your disappointment with the proposed action because of the large acreage of clearcuts and miles of new roads proposed is noted. However, your statement that 313 acres of clearcuts would be visible from KVAs in Icy Strait is not correct. Between 0 and 5 acres of the proposed clearcuts in the proposed action, Alternative 3 (which is also the preferred alternative), would be visible from any of the KVAs except KVA 4 (refer to Tables 3-36 to 3-41 in the DEIS). Portions of 13 units with a clearcut with reserves prescription (totaling approximately 171 acres) would be visible from KVA 4. Concentrating reserve trees in the visible portions of these units would mitigate this. Refer to Figures 3-15 and 3-17 for photos of the current view from KVA 4 and the projected view after harvest as proposed under Alternative 3.

TL-2: Timber would not be sold unless timber values increase to the point that the offered sale is economical.

TL-3: Your support for Alternative 5 because of the long-term benefit to residents of Gustavus and the more pristine forest that would remain for deer, bear, marten, and subsistence activities is noted. Your statement that there would be no cost to the taxpayers if Alternative 5 is adopted is not correct. All costs incurred to study the area, including preparation of the EIS, repair and maintenance of roads and the LTF, and administration of the small sales would still be borne by the taxpayers. The small sales would generate less income to offset this investment than the preferred alternative, or Alternatives 2 and 6. Refer to Table 3-27 of the DEIS.

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Southeast Alaska Conservation Council

SEACC 419 6th Street, Suite 200, Juneau, AK 99801
(907) 586-6942 phone • (907) 463-3312 fax
www.seacc.org • info@seacc.org

Couverden Timber Sale Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

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MAR 29 2004

Juneau Ranger
District

March 29, 2004

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Juneau Ranger
District

Re: comments on Couverden Timber Sales Draft Environmental Impact Statement

To Whom it May Concern:

The following comments are submitted by the Southeast Alaska Conservation Council (SEACC) and The Wilderness Society on the Couverden Timber Sales Draft Environmental Impact Statement (DEIS). The proposed action for the Couverden project area is to log approximately 20 million board feet (mmbf) of old-growth timber and construct 3.4 miles of new, permanent roads and 1.8 miles of temporary roads.

SEACC is a coalition of eighteen volunteer citizen conservation groups in fourteen communities across Southeast Alaska, from Ketchikan to Yakutat. Our individual members include commercial and sport fishermen, Alaska Natives, tourism and recreation business owners, small-scale high-value added wood product manufacturers, hunters and guides, and Southeast Alaskans from all walks of life. We are dedicated to safeguarding the integrity of Southeast Alaska's unsurpassed natural environment while providing for the sustainable use of our region's resources.

SEACC-1

The Wilderness Society (TWS), founded in 1935, is a non-profit membership organization devoted to preserving wilderness and wildlife, protecting America's prime forests, parks, rivers, deserts, and shore lands, and fostering an American land ethic. TWS has approximately 200,000 members nationwide, with about 700 in Alaska.

I. INTRODUCTION

In the 1997 Record of Decision (ROD) for the revised Tongass Land Management Plan (TLMP), the Regional Forester directed the Forest Supervisor and District Rangers "to increase their efforts in collaborative stewardship within the communities of Southeast Alaska." 1997 ROD at 42. Although the Forest Service has missed important opportunities to collaborate with local communities on the north Tongass in the past, specifically on timber sale planning in Tenakee Inlet, we appreciate the collaborative efforts of the Juneau Ranger District has made with citizens from Gustavus so far during

SEACC-2

ALASKA SOCIETY OF AMERICAN FOREST DWELLERS, Point Baker • ALASKANS FOR JUNEAU • CHICHAGOF CONSERVATION COUNCIL, Tenakee
CUSTOMARY & TRADITIONAL GATHERING COUNCIL OF KAKE • FRIENDS OF BERNERS BAY, Juneau • FRIENDS OF GLACIER BAY, Gustavus • JUNEAU AUDUBON SOCIETY
JUNEAU GROUP SIERRA CLUB • LOWER CHATHAM CONSERVATION SOCIETY, Port Alexander • LYNN CANAL CONSERVATION, Haines • NARROWS CONSERVATION
COALITION, Petersburg • LISIANSKI INLET RESOURCE COUNCIL, Pelican • PRINCE OF WALES CONSERVATION LEAGUE, Craig • SITKA CONSERVATION SOCIETY
TONGASS CONSERVATION SOCIETY, Ketchikan • TAKU CONSERVATION SOCIETY, Juneau • WRANGELL RESOURCE COUNCIL • YAKUTAT RESOURCE CONSERVATION COUNCIL

this planning process, in particular, the District's willingness to consider an alternative in the DEIS that reflect some of the recommendations offered by those citizens. This alternative meets the needs of small, local wood manufacturers in the area for a stable supply of timber, as well as minimizing environmental effects.

SEACC-2
Cont.

We are concerned, however, that it appears the Forest Service took inadequate steps to collaborate with the Hoonah Indian Association prior to defining the proposed action for this project or selecting it as the "preferred" alternative in the DEIS. We would have expected the Forest Service to have begun its government-to-government contacts very early in this planning process with the Association, as the federally recognized Tribal Government for the Hoonah Tlingit. As pointed out in comments submitted by the Association on this DEIS, the Couverden Project Area falls within the recognized boundaries of their customary and traditional use area and is considered a "place of origin within Huna Traditional Territory."¹

SEACC-3

Given the Hoonah Indian Association's opposition to the agency's "preferred" level of development for this project, as well as preference for "small scaled, sustainable timber operations," we strongly encourage the Forest Service to take this opportunity to address the concerns of both the Association and residents of Gustavus with this proposal. Perhaps such collaboration can result in a decision that properly recognizes the values of this culturally significant land, provides a truly sustainable supply of timber for nearby small-scale operators, and makes both ecological and economic sense. Both SEACC and TWS stand ready to work with all involved to contribute to reaching such an outcome.

SEACC-4

II. ALTERNATIVES

The range of alternatives considered by the Forest Service was quite broad. We particularly appreciate the Forest Service's decision to include an alternative reflecting some of the recommendations offered by residents of Gustavus. Closer inspection of the DEIS, however, raises some big questions about how accurately the Forest Service followed the citizen recommendations in constructing Alternative 5.

Our biggest concern relates to the size of this alternative. As noted in the DEIS, "[t]his alternative would seek to make 100 thousand board feet (mbf) to 500 mbf of timber available to local operators each year for 10 years." DEIS at 2-9. Given the stated purpose of the alternative to provide 1 to 5 million board feet to local operators over the next 10 years, why does the Alternative 5 disclosed in the DEIS call for logging 8 million board feet? What effect does inflating the timber offered under this alternative have on timber sale economics, important cultural and heritage resources, and wildlife? For example, Alternative 5 contains portions of several units that may adversely affect areas used as travel corridors for moose, deer, bear, and marten. See DEIS at 3-31. To what extent could these effects have been minimized or avoided if the Forest Service hadn't nearly doubled the volume originally proposed by Gustavus residents for considered under this alternative? We strongly recommend the Forest Service work closely with

SEACC-5

¹ Letter from Wright Jr., President of Hoonah Indian Association to USFS (March 1, 2004)(Couverden timber sale comments).

residents of Gustavus and the Hoonah Indian Association to reconfigure Alternative 5 in a manner that fully addresses their needs and concerns.

SEACC-5

III. ADEQUACY OF ANALYSIS OF TIMBER SALE ECONOMICS, INCLUDING ANNUAL MARKET DEMAND, ECONOMIC EFFICIENCY, AND PUBLIC INVESTMENT ANALYSIS.

A. Timber Supply and Market Demand Analysis Relies on Outdated, Incomplete, Unreliable, or Undisclosed Data.

The discussions in the DEIS relating to timber supply and annual market demand present many of the same concerns that SEACC has addressed in our appeals of other recent timber sales. We raise these concerns now at the DEIS stage to give the Forest Service the opportunity to address them fully.

The DEIS cites to several Forest Service documents that form the basis for many of the calculations presented. The caveat to use the most current, and when available, actual rather than estimated, data available is clearly stated in at least one of these documents: use the "most current data available."² NEPA also requires the Forest Service to use information of high quality, ensure the professional integrity of the discussions and analysis and identify the methodologies used, and independently evaluate the information submitted to it by the applicant or EIS contractor. *See* 40 C.F.R. §§ 1500.1(b), 1502.24, 1506.5(a). In enacting the Data Quality Act, Congress further attempted to ensure that the information federal agencies use and disseminate meet certain quality standards.³ Although the Forest Service has adopted guidelines to comply with the Data Quality Act,⁴ much of the data presented in the DEIS is outdated, incomplete, or unreliable.

SEACC-6

1. Industry Employment

In describing timber industry employment in the DEIS, the Forest Service relies upon data showing annual logging levels by ownership and region-wide employment totals. Chapter 3 of the DEIS, however, only provides data on cutting levels from 1983 to 2001. Since the Forest Service has issued Cut and Sold Reports for FY02 and FY03, why wasn't this updated information used in the DEIS? Although Table A-1 in Appendix A (at A-8) indicates that nearly 34 mmbf was cut from the Tongass in 2002, it discloses no data on the volume cut in FY 2003. We know the agency has this information. Why isn't it used in the DEIS?

A problem with the employment data disclosed in the DEIS is that it only refers to region-wide employment levels. In May 2003, SEACC received tabulated data from the

SEACC-7

² USDA Forest Service, Alaska Region, Report RR10-MB-413, *Responding to the Market Demand for Tongass Timber* at 30 (April 2000)(hereinafter "*Responding to the Market Demand for Tongass Timber*")

³ *See* Treasury and General Government Appropriation Act of Fiscal Year 2001, Pub. L. No. 105-544, § 515 Appendix C, 114 Stat. 2763A-153 (2000).

⁴ *See* http://www.ocio.usda.gov/irm/qi_guide

Forest Service showing Tongass-related employment from 1982 through the first 2 quarters of 2002.⁵ Now, nearly 1 year later, we assume the Forest Service has updated figures for Tongass-related employment. Why would the Forest Service not disclose and use this updated data?

SEACC-7
cont.

2. Basis for Timber Supply and Market Demand Analysis

The Timber Sale Economics section of the DEIS presents a discussion of timber supply and market demand, stating that “[d]etermining market demand is a complex process.” DEIS at 3-62. The reader is directed to Appendix A for a detailed explanation and to the 1997 TLMP. Here again we have concerns with the timeliness and the sources of the data used.

As noted both in the DEIS and in Appendix A, an examination of annual market demand is necessary to justify how much timber will be offered in a given fiscal year, and “annual market demand is analogous to assessing industry performance in the short-term.” *Id.*; DEIS at A-6. Yet, the public is hindered in comprehending these discussions because the Forest Service has not clearly identified its data source, has chosen to use outdated data, or has chosen simply to ignore available data.

SEACC-8

The DEIS should identify and explain recent indicators of the severe market malaise affecting demand for Tongass timber. These include the large number of contract extensions⁶ or cancellations⁷ resulting from weak markets, the large number of sales not receiving bids,⁸ as well as the significant differences between the assumptions underlying Brooks and Haynes’s 1997 projections and actual conditions today.⁹ We note that much of this information should be readily available in the Timber Supply and Demand Reports that Section 706(a) of ANILCA requires the Forest Service to prepare annually. The last Section 706(a) report prepared by the Forest Service was for FY 2000. For the record, we dispute the validity of this last report because the Forest Service did not consult with SEACC and others, as directed by Congress, before submitting this report to Congress. See Section 706(c) of ANILCA, 16 U.S.C. §539e(c).

⁵ See Exhibit 1: Guy Robertson, U.S. Forest Service, Employment in the Wood Products Industry in Southeast Alaska, 1982-2002 data provided to SEACC, May 2003.

⁶ See Notice of Extension of Certain Alaska Timber Sale Contracts, 67 Fed. Reg. 51165-67 (Aug. 7, 2002).

⁷ See Exhibit 2: USDA Forest Service Press Release, *USDA Forest Service Offers Timber Sale Contract Cancellations to Southeast Lumber Companies*, (Jan. 9, 2004); List of Timber Sales that may be cancelled pursuant to Section 339 of the Interior and Related Agencies Appropriations Act for 2004 (Jan. 9, 2004).

⁸ See Exhibit 3: USDA Forest Service, Bid Information for Tongass NF Timber Sales FY 2000 to 10/6/03, obtained by SEACC from Gene Miller, Region 10 TIM Coordinator, Oct. 6, 2003. This table shows that 88% of 180 Tongass timber sales offered for sale during FY 2000 through FY 2003 received either 1 bid or no bids.

⁹ See Alaska Dept. of Labor and Workforce Dev., *Alaska Economic Trends* (Dec. 2003). Available from the website: <http://labor.state.ak.us/trends/trends03.htm>

The Timber Sale Economics section should include an analysis of the monetary effects of preparing sales that do not attract bidders, specifically previous Couverden offerings (*see, infra*, note 14 at 9) coupled with the effects associated with extending or canceling timber sale contracts. We also request that a current list of sales cancelled pursuant to Section 339 (*see* Exhibit 2), their associated volumes, and the effects of the cancellations on timber economics be included. What do these recent cancellations tell us about market conditions for Tongass timber? What are the benefits derived from canceling uneconomical sales only to turn around and offer additional uneconomical sales? Are the volumes from cancelled contracts added back into Pool 2, and, if so, are those volumes reflected in Table A-2 (DEIS at A-11)?

SEACC-9

According to the DEIS, "[t]he Regional Office annually updates actual estimates [of the volume of timber likely to be processed by the industry] for each year. DEIS at 3-64. Yet, nearly 2 quarters into FY 2004, the analysis in the DEIS continues to rely upon old data in *Tongass Timber Sale Procedures, Fiscal Year 2003* to identify timber supply objectives and predict annual market demand. *See id.*; Appendix A at A-7. Please clarify exactly what the agency means by describing these estimates as "actual." Moreover, if the Regional Office actually updates its estimates of demand annually, why weren't the estimates actually updated for FY 2004 used in this DEIS?

SEACC-10

The DEIS also fails to disclose the data and analysis relied upon to justify the conclusion that 151 MMBF was needed to be offered to meet timber supply objectives for Fiscal Year 2003. In addition, no analysis directly compares this estimate with what actually happened in 2003 – the Forest Service offered 88.8 MMBF, sold 36.5 MMBF, and industry cut roughly 35 MMBF.¹⁰ Despite these actual numbers, the Forest Service continues to assert that market demand is "expected to average 168 MMBF per year." DEIS at A-17. The Forest Service should update and disclose the results of this procedure for Fiscal Year 2004, using readily available evidence of actual market demand for Tongass timber.

SEACC-11

In the course of updating the procedures, we encourage the Forest Service to accurately and realistically represent current mill capacity and utilization rates. The actual information used by agency experts to calculate its estimates of annual demand under the *Timber Sale Procedures* must be disclosed in the FEIS. Without this information, the public cannot be assured that the Forest Service took a hard look at the relevant information in reaching its demand estimates.

SEACC-12

¹⁰ *See* Exhibit 4: *Volume of Timber Offered, Sold, and Cut by Independent, Non-pulp Mill Purchasers*. As noted in this Exhibit, we deducted the 16 mmbf cut by Ketchikan Public Utilities pursuant to a special use permit to clear the powerline corridor for the Swan Lake – Lake Tyee Intertie. If not for this right-of-way clearing, the volume actually cut by Tongass timber operators would have only been about 35 mmbf.

3. *It is Unreasonable for Forest Service to Rely on Brook and Haynes Projections.*

The DEIS explains that the basis for the long-term demand projections were documented in *Timber Products Output and Timber Harvest in Alaska: Projections for 1997-2010* (Brooks and Haynes 1997). DEIS at 3-64. We have several significant problems with the Forest Service's reliance on Brooks and Haynes to justify this timber sale.

First, the ROD for the 1997 TLMP erroneously interpreted the May 15 Brooks and Haynes draft by concluding that the demand projections contained in that draft are "for sawlogs suitable for producing lumber in Southeast Alaska mills." See ROD for 1997 Tongass Plan at 25. In fact, the projections encompassed both sawlogs and utility logs. This error led to an assumption in the Tongass Plan decision that an annual logging level of between 130 mmbf and 296 mmbf would be needed to satisfy the projections in the May 15 Brooks and Haynes draft. *Id.* The erroneous interpretation of the May 15 Brooks and Haynes draft caused the Regional Forester to seek to provide a supply of timber that was significantly higher than necessary to meet the actual Brooks and Haynes projections. In so doing, the Forest Service allocated significantly more land for timber production than was necessary to meet the Brooks and Haynes projected market demand. Consequently, the Forest Service lacks a reasonable basis for the statement in the DEIS that "all suitable timberlands will eventually be scheduled for harvest to meet the current and projected demand for raw material in Southeast Alaska." DEIS at A-17.

Secondly, the Forest Service makes no attempt in the DEIS to verify the accuracy or inaccuracy of Brooks and Haynes assumptions about industry's ability to recover some of the markets lost to other producers, export all manufacturing residues, and make gains in technical efficiency. Brooks and Haynes also assumed that North America would maintain a certain share of Japanese softwood lumber imports and the assumption that 15 to 35 percent of Alaska's lumber production would go to domestic markets. In order to take a hard look at the effect of market demand, both annually and over the long-term, the Forest Service must disclose and discuss actual market conditions faced by the Tongass timber industry in 2004 and compare those conditions with the assumptions made by Brooks and Haynes in 1997.

We also find it interesting that the Forest Service only refers to Brooks and Haynes when discussing long-term market demand. See DEIS at A-7. Our analysis of Morse's *Timber Sale Procedures* shows that those procedures use Brooks and Haynes' general projections of logging levels as the floor for estimates of expected timber purchases. Given the extraordinary market changes that have occurred since 1997 and the fact that 90-95% of existing sales cannot be operated profitably¹¹, please explain why the Forest Service relies on general, externally derived and overly high forecast of logging levels to predict annual market demand. For example, according to Table A-1, *Projected National Forest Harvest for Market Demand*, Brooks and Haynes projected that timber operators would cut 131.9 mmbf in the low market scenario in 2004. See DEIS at A-8. Yet, this level of

¹¹ See Exhibit 5: Memorandum from Steve Brink, Deputy Regional Forester for Natural Resources, to Chief of the U.S. Forest Service (March 28, 2002).

cutting has been reached by independent purchasers only twice in the last 20 years. Despite this, Morse's *Timber Sale Procedures* assume that logging levels will be 131.9 mmbf in 2004 regardless of real market conditions or actual cutting levels. Why, given what the Forest Service knows about actual market conditions, would the Forest Service's formula for calculating annual market demand assume that operators will cut at levels among the highest ever for independent operators?

SEACC-13
cont.

Other comments and questions regarding the information or analysis contained in Appendix A are summarized below:

- Why hasn't Table A-1 been updated to include actual logging levels for FY 2003?
- Table A-1 also references an analysis conducted prior to the beginning of each fiscal year that determines "if the projection [of cutting levels] meets the anticipated need." DEIS at A-8. The Forest Service needs to disclose the results of this analysis for FY 2004, as well as the information used by agency experts to support that determination in the FEIS.
- The poor formatting for the rows of data used for Table A-2 makes it almost impossible to understand this information. In addition, the FEIS needs to disclose the pipeline pool volume proposed for FY 2004, as well as the actual volumes cut by mill operators in FY 2003.
- The DEIS claims that 45.9 mmbf of timber volume is either remanded on appeals and/or enjoined in litigation. See DEIS, Table A-3 at A-11. Please identify precisely what volume from what timber sales is incorporated into this figure.
- The Tongass Ten Year Timber Sale Plan for FY 2004 is currently available at the Tongass National Forest website. Please use this current plan for Table A-5. DEIS at A-16.
- The DEIS claims that the volume of timber needed to maintain Pool 1 is 562 mmbf. See DEIS, at A-17. Please explain the basis for this figure.

SEACC-14

B. Where is the Economic Efficiency Analysis?

In describing the Purpose and Need for this timber sale, the Forest Service claims that this sale is intended to respond to several goals and objectives of the Forest Plan. One of those goals calls for managing the timber resource in an "economically efficient manner." See DEIS at 1-4. The DEIS, however, concludes that "[n]one of the proposed alternatives would be economically viable under current market conditions." Given this unambiguous statement, how can the Forest Service justify any of these alternatives as being economically efficient?

SEACC-15

Instead of conducting an economic efficiency analysis, the Forest Service relies instead upon a "financial efficiency analysis." While we agree that such an analysis can provide a tool for comparing alternatives, we remain at lost to explain how such an analysis will help decision makers determine if an alternative is, in fact, economically efficient. Without this information, how can the Forest Service conclude that any of these alternatives satisfy the stated purpose and need for the project?

SEACC-16

As in other recent sales, the Forest Service used the NEPA Economic Analysis Tool (NEAT) for conducting its timber financial efficiency analysis. See DEIS at 3-67. While the DEIS discloses in general what information is factored into the NEAT program for calculating financial efficiency, it fails to disclose what information was actually used for the analysis presented in the DEIS. For example, the DEIS does not identify what stumpage values were actually used to evaluate the alternatives. While the DEIS informs the public that the expected bid value used in the NEAT calculation is based on the average selling value for the last 10 sales, it fails to identify the specific data used. DEIS at 3-67. We also noticed a difference between the number of sales for which stumpage values were used in this DEIS (10 sales), and the number used in other sales. For example, the Licking Creek FEIS (at 3-11) used the last 15 sales.

SEACC-17

According to the DEIS, “[d]ue to market conditions, utility logs are not currently required to be removed during harvest operations.” DEIS at 3-67. This statement raises a couple of questions that the DEIS makes no attempt to address. First, does this mean utility logs will be cut even if they are not removed? Assuming for the purpose of discussion that the growth rate of these lower value trees would increase if the surrounding trees are removed, how can such a practice be consistent with the purpose and need to make suitable timber available for logging on an even-flow, long-term sustained yield basis? What costs will the Forest Service incur from wasting these utility logs in the short-term?

SEACC-18

C. Public Investment Analysis is Inadequate.

The DEIS section entitled “Public Investment Analysis” fails to provide a comprehensive and accurate estimate of the costs the Forest Service expects to incur in evaluating and administering the Couverden sale. Instead, the FEIS simply asserts that the Forest Service expects to expend “\$20.50/CCF for analysis, \$11.50/CCF for sale preparation, \$4.50/CCF for sale administration and \$14.00/CCF for engineering support.” See DEIS at 3-72. The FEIS states that these numbers are “based on the Region 10 average budget allocation.” *Id.*

This approach is insufficient for several reasons. First, it uses budget estimates when the Forest Service has more accurate information. Indeed, the Forest Service is required to keep track of its expenditures and evaluate whether the “costs associated with carrying out the planned management prescriptions (including those of producing outputs) [are] consistent with those estimated in the Plan.” TLMP at 6-16. The Forest Service needs to use the actual numbers expended in FY 2003 to make this analysis meaningful.

SEACC-19

Second, the generalized analysis contained in the DEIS fails to include all the costs that must be paid out of timber receipts. It is unclear, for example, whether the broad categories listed in the DEIS include costs associated with reforestation, timber stand improvements, log dumps, and road construction, maintenance, and reconstruction. While the DEIS includes an allocation for “engineering support,” it fails to explain whether this allocation includes road construction and reconstruction costs borne by the Forest Service for road augmentation, including both contribution and supplementation costs. Specifically, for example, the DEIS references \$18,400 of critical maintenance and \$189,000 of non-critical maintenance needed in the project area. DEIS at 3-186. How are

these costs factored into the Public Investment Analysis? Likewise, it is unclear whether the allocation for "sale administration" includes the costs borne by taxpayers for reforestation and timber stand improvement.

Third, the DEIS fails to provide a direct comparison of the perceived economic benefits from this sale as related to these costs. Even assuming the Forest Service's costs are accurate and complete, the agency has shown that for every \$100 spent on the Tongass timber program the U.S. taxpayers lose about \$64 dollars.¹² Remarkably, no mention is made in the Public Investment Analysis of the chronic losses borne by U.S. taxpayers to implement the Tongass timber program.¹³ We urge the Forest Service to construct this public investment analysis for the FEIS in such a way that both the public and the decisionmaker can understand easily the costs incurred by the Forest Service and the perceived benefits consequently gained.

SEACC-19
cont

D. Cumulative Loss Associated with Couverden Timber Sales is Not Disclosed.

Lastly, we request that the section entitled "Cumulative Effects" (DEIS at 3-72) be supplemented to include the history of previous Couverden timber offerings. This information is conspicuously absent from the DEIS despite public references throughout the current planning process to the losses the Forest Service incurred in the mid-1980s to build almost 30 miles of road and lay-out a sale that drew no bidders.¹⁴

SEACC-20

IV. WILDLIFE AND ITS USES

Throughout the development of TLMP, the State of Alaska emphasized the exceptional importance of fish, wildlife, and their habitats to the people of Southeast Alaska. In particular, the state identified those VCUs with the highest community use values.¹⁵ The state rated the area known locally as Homeshore, VCU 1200, as one of 86 VCUs on the Tongass with the highest community use values. We were surprised and disappointed that this information was not disclosed in the DEIS nor were specific steps to mitigate or avoid adverse effects to community use or fish and wildlife values in this area specifically addressed. To evaluate adequately the effect of the proposed alternatives on the "human environment," the Forest Service must evaluate the effects of the proposed action on these high community use values.

SEACC-21

The DEIS states: "all new roads built for timber harvesting would be placed in storage after the completion of harvest activities, eliminating vehicle access." DEIS at 3-189. The

¹² USDA, *Final Supplemental Environmental Impact Statement for the Tongass Land Management Plan Roadless Area Evaluation for Wilderness Recommendations*, Table 3.4-23 at 3-299 (Feb. 2003).

¹³ See Exhibit 6: SEACC, *Taxpayer Losses and Missed Opportunities: How Tongass Rainforest Logging Costs Taxpayers Millions* (Fall 2003).

¹⁴ See Exhibit 7: James Mackovjak, *Couverden Timber Sale still fleeces taxpayers*, Juneau Empire (Sept. 3, 2002); Paul Barnes, *Support citizens' plan*, Juneau Empire (March 28, 2004).

¹⁵ See Flanders, Lana et al., *Tongass Fish and Wildlife Resource Assessment* (1998).

SEACC-22

rationale for applying the access management strategy of “eliminate” to new roads is “to minimize resource impacts.” *Id.* In apparent conflict with the statements above is the statement that appears earlier in the DEIS: “[a]fter the completion of harvest activities, all new roads would be closed to motorized vehicles (*except ATVs*).” DEIS at 2-8 (emphasis added). Please reconcile this discrepancy. If indeed the intent of road closure is to protect the resources, including wildlife, from negative impacts, please explain how ATV use would or would not impact the resources. Would allowing ATV use, for instance, negate the effort to “reduce access into critical bear feeding areas along Homeshore Creek”? DEIS at 3-190. Also, please discuss the effectiveness of the “eliminate” access management strategy at preventing ATV access.

SEACC-22
cont.

In addressing viable wildlife populations and old-growth habitat reserves, the DEIS limits its discussion to the inter-agency review of the adequacy of the mapped small old-growth reserve in VCU 1180. TLMP¹⁶ requires the Forest Service “to conduct an analysis at the landscape scale to identify blocks of contiguous old-growth forest habitat within large and medium reserves and other natural setting LUDs” See TLMP, WILD 112.VIII. A. 2, at p.4-120. While the particular purpose for this landscape analysis is to assess habitat connectivity, this analysis should also provide sufficient information to evaluate how well the designated reserves comply with the reserve criteria spelled out in Appendix K to TLMP. We request the agency to include in the FEIS an evaluation of all the reserves within, or immediately adjacent to, the Couverden project area.

SEACC-23

V. FOREST SERVICE FAILS TO JUSTIFY AN EXEMPTION FOR THE PROJECT’S PERMANENT OR TEMPORARY ROADS UNDER SECTION 404 OF THE CLEAN WATER ACT.

The U.S. Army Corps of Engineers exempts roads for “normal silvicultural activities” from regulation under Section 404 of the Clean Water Act. This exemption, however, is narrow. For example, roads may be exempted only if they are constructed and maintained in accordance with BMPs to ensure non-impairment of flow and circulation patterns, and chemical and biological characteristics of the affected waters. The BMPs that must be applied to satisfy this provision include proper stabilization and maintenance of road fill and assurance of fish passage. See 33 C.F.R. §§ 323.4(a)(6)(iv), (vii). In addition, all temporary fill must be removed “in its entirety” at the completion of logging activities. *Id.* at 324.4(a)(6)(xv).

SEACC-24

According to the DEIS, the Forest Service has identified fill maintenance problems on Road 8553 near Milepost 8.2 and on Road 8562 at Milepost 2.5.” DEIS at 3-187. In addition, the DEIS states that up to six stream crossings in the project “may restrict the movement of fish.” DEIS at 3-187. We note that the two failing culverts on Class I streams referenced in the DEIS also appear in the 2000 ADF&G Tongass Road Condition Survey Report.¹⁶ It has now been 4 years since publication of this report and possibly 5 to 6 years since these culverts were identified as failing during road surveys. The ADF&G

SEACC-25

¹⁶ Linda Shea Flanders & Jim Cariello, *Tongass Road Condition Survey Report*. ADF&G Technical Report No. 00-7 (June 2000).

report also lists 3 additional culverts "with inlet erosion requiring corrective action"¹⁷ that are not referenced in the DEIS. Has corrective action already been taken on these culverts? If not, why are they not referenced in the DEIS?

SEACC-25
Cont

While the Forest Service has designed and applied BMPs for numerous years, the agency has failed to undertake a substantial effort to monitor the *effectiveness* of these BMPs. In the Tongass National Forest Annual Monitoring and Evaluation Report for Fiscal Year 2002, the Forest Service studied a representative sample of projects where BMPs have been implemented to determine if these BMPs are effective in meeting state water quality criteria (e.g. turbidity, sediment, and temperature), or in maintaining physical habitat condition¹⁸ (2-107). Data collected indicate that "under typical conditions, BMPs are probably effective in achieving water quality criteria for turbidity..."¹⁹

SEACC-26

The DEIS lists \$18,400 of critical maintenance needs and \$189,000 of non-critical needs that have been deferred in the project area. DEIS at 3-186. Given this maintenance backlog within the project area, we cannot fathom how the Forest Service can qualify for a forest road exemption under Section 404. See 33 C.F.R. § 329.4(a)(6). Can the Forest Service give any assurance that it will properly maintain project bridges and roads in the future? If not, what justification does the Forest Service have for proposing any new roads in this project area or not permanently closing all existing roads by removing all bridges and culverts?

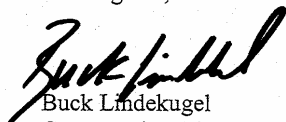
SEACC-27

The DEIS also fails to disclose the characteristics of the fill material to be used in the construction of temporary roads, where it will come from, how it will be removed, or where the fill waste will be stored. Additionally, there is no site-specific information regarding design criteria, fish passage, erosion control measures, the effects on wetlands, or the effect of soil compaction on short and long-term soil productivity related to temporary roads. In fact, nowhere in the DEIS does the Forest Service discuss obliteration of temporary roads upon cessation of logging activities. In addition, the mitigation measures outlined in Appendix D do not specifically require removal of temporary road fill in its entirety, as required by regulation. See 33 C.F.R. § 323.4(a)(6)(xv). How will the Forest Service comply with this legal requirement?

SEACC-28

Thank you for your attention to our comments and questions. We look forward to reviewing the FEIS and seeing how the Forest Service has addressed our concerns.

Best regards,


Buck Lindekugel
Conservation Director

¹⁷ *Id.* at Appendix E.

¹⁸ USDA Forest Service, *Tongass National Forest Annual Monitoring and Evaluation Report for Fiscal Year 2002*, R10-MB-478, (July 2003), at 2-107.

¹⁹ *Id.*, at 2-119, emphasis added.

Table of Exhibits

<u>Exhibit No.</u>	<u>Description</u>
1	Guy Robertson, U.S. Forest Service, Employment in the Wood Products Industry in Southeast Alaska, 1982-2002 data provided to SEACC, (May 2003).
2	USDA Forest Service Press Release, <i>USDA Forest Service Offers Timber Sale Contract Cancellations to Southeast Lumber Companies</i> , (Jan. 9, 2004); List of Timber Sales that may be cancelled pursuant to Section 339 of the Interior and Related Agencies Appropriations Act for 2004 (Jan. 9, 2004).
3	USDA Forest Service, Bid Information for Tongass NF Timber Sales FY 2000 to 10/6/03.
4	Volume of Timber Offered, Sold, and Cut by Independent, Non-pulp Mill Purchasers
5	Memorandum from Steve Brink, Deputy Regional Forester for National Resources, to Chief of the U.S. Forest Service (March 28, 2002)
6	SEACC, <i>Taxpayer Losses and Missed Opportunities: How Tongass Rainforest Logging Costs Taxpayers Millions</i> (Fall 2003)
7	James Mackovjak, <i>Coueverden Timber Sale still fleeces taxpayers</i> , Juneau Empire (Sept. 3, 2002); Paul Barnes, <i>Support citizens' plan</i> , Juneau Empire (March 28, 2004).

Table A-2. Employment in the Wood Products Industry in Southeast Alaska, 1982-2002.

Year ¹	Tongass Logging ²	Sawmill	Pulp Mill	Tongass-Related Employment ³	Other Logging	Total Industry Employment
1982	335	540	975	1,850	656	2,506
1983	574	429	854	1,857	436	2,293
1984	513	395	700	1,608	433	2,041
1985	559	363	580	1,502	445	1,947
1986	692	331	772	1,795	547	2,342
1987	862	375	861	2,098	683	2,781
1988	1,010	468	892	2,370	971	3,341
1989	1,166	478	925	2,569	947	3,516
1990	1,123	500	899	2,522	1,021	3,543
1991	872	604	911	2,387	682	3,069
1992	788	538	910	2,236	627	2,863
1993	754	447	859	2,060	590	2,650
1994	621	515	533	1,669	556	2,225
1995	702	301	516	1,519	483	2,002
1996	804	230	524	1,558	353	1,911
1997	823	184	318	1,325	226	1,551
1998	579	284	96	959	310	1,269
1999	305	303	63	671	519	1,190
2000	340	280	2	623	371	994
2001	109	276	2	387	395	782
2002 ⁴	41	152	2	195	214	409

Source: Alaska Department of Labor.

¹ 2000 reported in calendar years. Prior to 2000, federal fiscal years were used.

² Tongass National Forest logging estimated based on the ratio of Tongass timber harvest to total timber harvest in Southeast Alaska.

³ Assumes all employment sawmill and pulp mill employment is dependent upon Tongass National Forest timber supply.

⁴ Preliminary estimate based on first 2 quarters of 2002.



NEWS

TONGASS NATIONAL FOREST

UNITED STATES DEPARTMENT OF AGRICULTURE-FOREST SERVICE

Contact: Dennis Neill
Phone: 907-228-6201
Release Date: Jan. 9, 2004

USDA FOREST SERVICE OFFERS TIMBER SALE CONTRACT CANCELLATIONS TO SOUTHEAST LUMBER COMPANIES

Ketchikan, Alaska – In order to save money for taxpayers and preserve jobs in the local forest economy, several timber sale contracts on the Tongass National Forest may be cancelled by mutual agreement this year. Twenty sales on the Tongass meet the criteria for mutual cancellations provided in Section 339 of the Interior and Related Agencies Appropriation Act for fiscal year 2004.

According to the Act, the U.S. Department of Agriculture's Forest Service may cancel, with the consent of the timber purchaser, timber sale contracts on the Tongass National Forest awarded between Oct. 1, 1995, and Jan. 1, 2002. USDA must determine that the sale would result in a financial loss to the purchaser; and that the costs to the government of seeking a legal remedy against the purchaser would likely exceed the cost of terminating the contract.

"We're making this adjustment in business practices to help our struggling, family-owned timber business to stay alive in these difficult times," Tongass National Forest Supervisor Forrest Cole said. "They are an important spoke in the economic wheel of Southeast Alaska," he added.

All 20 sales are viewed as uneconomical under current timber markets, and it is highly unlikely that markets will improve enough for them to become economical during the life of the timber sale contract, Cole noted. If the sales were not cancelled, the purchasers would lose enough money to force some or all of them into bankruptcy.

The Forest Service is sending letters to the purchasers today offering the opportunity to cancel the qualifying sales. Timber purchasers have until Sept. 30, 2004, to respond. The 20 sales range in size from 72,000 board feet to 35 million board feet and comprise a total of about 138 million board feet of timber. The timber included in these contract cancellations may be available for resale.

#

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The USDA is an equal opportunity provider

Exhibit 2 Page 1 of 2

Timber Sales that may be cancelled pursuant to Section 339 of the Interior and
Related Agencies Appropriations Act for 2004

Purchaser Name	Sale Name	Remaining Volume (MBF)
David Seaford	Log Jam	1,190.95
David Seaford	Rush Fast	158.86
New Age Mining&Excavation	Wolf Pup	1,192.77
Pacific Log & Lumber Ltd	Rowan Mountain	20,231.09
Pacific Log & Lumber Ltd	Salty	300.00
Pacific Log & Lumber Ltd	Todahl Backline	7,868.14
Seley Family Partnership	Picasso	237.60
Silver Bay Logging Inc	Canal Hoya	16,127.01
Silver Bay Logging Inc	Crystal	7,016.54
Silver Bay Logging Inc	King George	10,572.41
Silver Bay Logging Inc	Rio Beaver	5,519.51
Silver Bay Logging Inc	South Lindy	8,564.00
Silver Bay Logging Inc	Upper Carroll	22,019.06
The Mill Inc	Wedge	643.95
Viking Lumber Company	6402	9,488.43
Viking Lumber Company	Bohemia	7,845.00
Viking Lumber Company	Shamrock	3,548.00
Viking Lumber Company	South Arm	4,749.45
Whitestone SE Logging Co	Humpback/Gallagher	11,265.29
3-D Logging	Deadwood #3 Salvage	72.56
Total Volume		138,610.62

Data provided by Dennis Neill, USDA Forest Service to Natural Resources Defense Council (Jan. 9, 2004)

Exhibit 2 Page 2 of 2

Bid Information for Tongass NF Timber Sales FY2000 to 10/6/2003						
Sale Name	District	MBF	Advertised	Bidder Name	Bid Value	Rk
Name	Volume	Date				
Earl Salvage	Wrangell	9.95	10/14/1999	Luthier Tone Woods	\$2,270.00	1
2052 Log Salvage	Thorne Bay	5.5	10/30/1999	Deadhead Logging	\$79.00	1
Fat Boy	Thorne Bay	5.88	11/8/1999	Brent Cole	\$876.00	1
Orion	Ketchikan	12192.13	11/15/1999	Gateway Forest Products	\$765,111.00	1
Orion	Ketchikan	12192.13	11/15/1999	Pacific Log & Lumber	\$741,147.00	2
Goose	Petersburg	1162.88	12/2/1999	Silver Bay Logging	\$3,881.00	1
Buckdance	Ketchikan	10726.29	2/15/2000	Gateway Forest Products	\$760,955.00	1
Madder	Ketchikan	25893.19	2/24/2000	Gateway Forest Products	\$1,099,789.00	1
Madder	Ketchikan	25893.19	2/24/2000	Pacific Log & Lumber	\$998,968.00	2
Beaver Slide II	Thorne Bay	4.5	3/11/2000	Brent Cole	\$51.00	1
South Central	Petersburg	940.88	3/16/2000	Silver Bay Logging	\$71,785.00	1
Sulzer Portage Trespass	Craig	312.32	4/1/2000	Haida Corporation	\$155,014.00	1
Microsale #1	Thorne Bay	1	4/21/2000	Larry Trumble	\$269.00	1
Baker Creek Stringer Salv	Thorne Bay	9	4/22/2000	Dan Justice	\$65.00	1
Strummin Alder	Thorne Bay	4	4/22/2000	William Kaufman	\$34.00	1
TnB Microsale #2	Thorne Bay	2.4	4/27/2000	3-D Logging	\$538.00	1
Old Hermit Roadside	Wrangell	43.3	5/4/2000	Luthier Tone Woods	\$4,700.00	1
Microsale #3	Thorne Bay	1	5/5/2000	Larry Trumble	\$269.00	1
Red Rush Cedar Salvage	Thorne Bay	4	5/6/2000	Jerry Jones	\$510.00	1
Red Rush Cedar Salvage	Thorne Bay	4	5/6/2000	Goose Creek Shingle	\$282.00	2
Red Rush Cedar Salvage	Thorne Bay	4	5/6/2000	H & L Salvage Inc	\$105.00	3
Steak And Shake Cedar	Thorne Bay	8	5/6/2000	H & L Salvage Inc	\$1,605.00	1
Steak And Shake Cedar	Thorne Bay	8	5/6/2000	Jerry Jones	\$1,120.00	2
TnB Microsale #4	Thorne Bay	2	5/23/2000	Jack Akerill	\$109.00	1
TnB Microsale #5	Thorne Bay	0.5	5/23/2000	Richard Blauvelt	\$27.00	1
East Fork	Petersburg	2186.83	6/1/2000	Silver Bay Logging	\$200,001.00	1
TnB Microsale #6	Thorne Bay	6	6/9/2000	Deadhead Logging	\$1,246.00	1
TnB Microsale #8	Thorne Bay	15	6/13/2000	Larry Trumble	\$4,035.00	1
TnB Microsale #7	Thorne Bay	1.5	6/16/2000	Richard Blauvelt	\$85.00	1
Ahtun III	Thorne Bay	60	6/17/2000	Porter Lumber	\$376.00	1
Relief III	Thorne Bay	257.32	6/17/2000	Beaver Creek Logging	\$3,936.00	1
Relief III	Thorne Bay	257.32	6/17/2000	Little Bit Logging	\$2,700.00	2
Relief III	Thorne Bay	257.32	6/17/2000	Porter Lumber	\$2,176.00	3
Buster Bay	Thorne Bay	290.8	6/24/2000	Beaver Creek Logging	\$15,501.00	1
TnB Microsale #9	Thorne Bay	8.5	6/27/2000	Jack Harrison	\$486.00	1
Rat Tail	Thorne Bay	54.6	6/30/2000	Goose Creek Shingle	\$4,412.00	1
Rat Tail	Thorne Bay	54.6	6/30/2000	H & L Salvage Inc	\$3,427.00	2
Rat Tail	Thorne Bay	54.6	6/30/2000	Larson Wood Products	\$1,610.00	3
E. Fork Thorne	Thorne Bay	39.5	7/8/2000	Goose Creek Shingle	\$6,120.00	1
E. Fork Thorne	Thorne Bay	39.5	7/8/2000	Larson Wood Products	\$1,963.00	2
TnB Microsale #10	Thorne Bay	8	7/17/2000	H & L Salvage Inc	\$2,579.00	1
TnB Microsale #12	Thorne Bay	9.5	7/21/2000	Richard Blauvelt	\$542.00	1
Deer Run Salvage	Wrangell	120	7/27/2000	Luthier Tone Woods	\$12,500.00	1
Mill Salvage	Wrangell	4.51	8/3/2000	Luthier Tone Woods	\$1,080.00	1
Cape Lynch Stringer	Thorne Bay	27.2	8/5/2000	Brent Cole	\$425.00	1
TnB Microsale #13	Thorne Bay	0.8	8/11/2000	Jack Akerill	\$50.00	1
TnB Microsale #13	Thorne Bay	0.8	8/11/2000	Jack Akerill	\$50.00	1
Camp Mossy Reoffer	Wrangell	1357.9	8/24/2000	Silver Bay Logging	\$138,760.00	1
TnB Microsale #15	Thorne Bay	6	9/5/2000	Jack Dupertuis	\$337.00	1
TnB Microsale #17	Thorne Bay	12	9/13/2000	Jack Akerill	\$606.00	1
TnB Microsale #11	Thorne Bay	3.98	9/18/2000	Jerry Jones	\$1,942.00	1
South Lindy Mt.	Petersburg	13525	9/21/2000	Gateway Forest Products	\$234,271.00	1
South Lindy Mt.	Petersburg	13525	9/21/2000	The Mill Inc	\$122,067.00	2
South Sand	Petersburg	1140.04	10/5/2000	The Mill Inc	\$49,575.00	1
South Sand	Petersburg	1140.04	10/5/2000	Silver Bay Logging	\$46,575.00	2
Twin Creek 15	Petersburg	160.99	10/5/2000	Silver Bay Logging	\$25,840.00	1
Little Naukati Salvage	Thorne Bay	88.3	10/21/2000	Porter Lumber	\$6,267.00	1
Steely Peelers	Thorne Bay	15.39	10/21/2000	Porter Lumber	\$2,156.00	1
Steely Peelers	Thorne Bay	15.39	10/21/2000	L & S Enterprises	\$427.00	2
TnB Microsale 14	Thorne Bay	13.2	10/26/2000	Larry Trumble	\$2,713.00	1

Bid Information for Tongass NF Timber Sales FY2000 to 10/6/2003						
	District	MBF	Advertised			
Sale Name	Name	Volume	Date	Bidder Name	Bid Value	Rk
Microsale 48	Thorne Bay	20.5	9/4/2002	3-D Logging	\$6,151.00	1
Microsale # 33	Thorne Bay	9.02	9/5/2002	James Harrison	\$1,287.00	1
Microsale #44	Thorne Bay	1.64	9/6/2002	Larry Trumble	\$224.00	1
Microsale # 49	Thorne Bay	6.56	9/13/2002	Danny Sunde	\$679.00	1
Big Pit	Hoonah	122.55	9/14/2002	D & L Woodworks	\$21,514.00	1
Summit Windjammer	Sitka	14.26	9/20/2002	Gregg Jones	\$4,112.00	1
Honey/George	Wrangell	3524.64	9/27/2002	Silverbay Logging, Inc.	\$528,384.00	1
Pepper	Thorne Bay	9253.73	9/30/2002	Viking Lumber Company	\$68,704.00	1
Summore Change	Thorne Bay	10989.32	9/30/2002	Viking Lumber Company	\$601,965.00	1
Microsale #47	Thorne Bay	2.87	10/28/2002	Larry Trumble	\$392.00	1
Microsale 51	Thorne Bay	20.09	10/28/2002	3-D Logging	\$2,210.00	1
Microsale #52	Thorne Bay	4.1	11/19/2002	Peavey Logging	\$585.00	1
Microsale 54	Thorne Bay	13.12	12/5/2002	Pat Richter Csl Farm And	\$1,007.00	1
Microsale 55	Thorne Bay	3.28	12/5/2002	Tom Bouy	\$468.00	1
Microsale 56	Thorne Bay	2.46	12/6/2002	David Hunter Norsemen Woo	\$336.00	1
Microsale #53	Thorne Bay	9.23	12/9/2002	Cary Walker Walker Wood P	\$696.00	1
Microsale #58	Thorne Bay	4.51	2/10/2003	Larry Trumble	\$615.00	1
Slide Loop Reoffe	Thorne Bay	6.15	2/22/2003	Danny Sunde	\$1,079.00	1
Microsale #60	Thorne Bay	12.71	3/31/2003	Hummer Enterprise Richard	\$1,734.00	1
Microsale #59	Thorne Bay	8.61	4/23/2003	Danny Sunde	\$1,058.00	1
Lucky Duck Reoffer	Thorne Bay	453	5/27/2003	Ernie Eads	\$31,506.00	1
Lucky Duck Reoffer	Thorne Bay	453	5/27/2003	3-D Logging	\$15,010.00	2
Lucky Duck Reoffer	Thorne Bay	453	5/27/2003	Ralph Porter, Porter Lumb	\$12,607.00	3
Lucky Duck Reoffer	Thorne Bay	453	5/27/2003	Keith Dahl	\$12,575.00	4
Lucky Duck Reoffer	Thorne Bay	453	5/27/2003	Viking Lumber Company	\$12,009.00	5
Lucky Duck Reoffer	Thorne Bay	453	5/27/2003	Dave Randell	\$11,010.00	6
Microsale #62	Thorne Bay	19.27	6/4/2003	Larry Trumble	\$2,930.00	1
Last Twin Re-Offe	Petersburg	1296.81	6/6/2003	SE Alaska Wood Products	\$20,205.00	1
Microsale 1	Wrangell	2.14	6/16/2003	Herman Ludwigsen	\$163.00	1
Twin Bridges II	Thorne Bay	7014.29	6/26/2003	Viking Lumber Company	\$140,942.00	1
Twin Bridges II	Thorne Bay	7014.29	6/26/2003	Pacific Log & Lumber Ltd.	\$81,289.00	2
Bowen	Petersburg	705.44	7/7/2003	SE Alaska Wood Products	\$7,176.00	1
Microsale # 63	Thorne Bay	19.27	7/14/2003	Hummer Enterprise Richard	\$2,930.00	1
Microsale #57	Thorne Bay	8.61	7/22/2003	Brent Cole	\$1,485.00	1
Vestal Re-Offe	Craig	134.39	7/25/2003	Red Esslinger Mountain Ma	\$11,214.00	1
Vestal Re-Offe	Craig	134.39	7/25/2003	Dave Randell	\$10,514.00	2
Vestal Re-Offe	Craig	134.39	7/25/2003	W R Jones & Sons Lumber	\$8,704.00	3
Vestal Re-Offe	Craig	134.39	7/25/2003	Keith Landers H & L Salva	\$5,832.00	4
Stirred Re-Offe	Craig	13.89	7/28/2003	Dave Randell	\$598.00	1
Stirred Re-Offe	Craig	13.89	7/28/2003	Keith Landers H & L Salva	\$537.00	2
Stirred Re-Offe	Craig	13.89	7/28/2003	W R Jones & Sons Lumber	\$442.00	3
Microsale #65	Thorne Bay	1.23	7/29/2003	Pat Richter CSL Farm And	\$187.00	1
Orion South	Ketchikan	3430.6	8/11/2003	Seley Family Ltd Partners	\$34,569.00	1
Basin Roadside	Wrangell	21.14	8/15/2003	Alaska Timber Wolf	\$377.00	1
Basin Roadside	Wrangell	21.14	8/15/2003	Alpine Forest Products	\$301.00	2
Nemo Roadside	Wrangell	49.85	8/22/2003	Alaska Timber Wolf	\$1,256.00	1
Stone Re-Offe	Craig	347.47	9/3/2003	Ronger E Grant	\$15,534.00	1
Microsale # 69	Thorne Bay	12.71	9/9/2003	Brent Cole	\$1,932.00	1
Microsale #64	Thorne Bay	0.41	9/11/2003	Pete Smith	\$39.00	1
False Island Alder	Sitka	16.37	9/19/2003	Gregg Jones	\$52.00	1
Ahtun II Salvage	Thorne Bay	60	4/15/2000			
Relief II Salvage	Thorne Bay	257.32	4/22/2000			
Whirly-Bolt Salvage	Craig	125	6/17/2000			
Schultze	Sitka	8205.27	8/25/2000			
Midway	Hoonah	9263.99	9/28/2000			
Skipping Cow	Wrangell	27774.47	2/22/2001			
Fork	Craig	292.24	6/2/2001			
Shaheen Salvage	Thorne Bay	127.3	6/18/2001			
Naukati Cedar Salvage	Thorne Bay	9	8/11/2001			
Knoll	Hoonah	277.17	8/16/2001			

Exhibit 3 Page 3 of 4

Volume of Timber Offered, Sold, and Cut by Independent, Non-pulp Mill Purchasers

Fiscal Year	Volume Offered (mmbf)	Volume Sold (mmbf)	Volume Cut (mmbf)
1998	187.1	24.1	40.0
1999	115.3	61.4	59.0
2000	85.3	170.3*	67.0
2001	67.9	49.6	47.8
2002	70.3	24.4	33.8
2003	88.8	36.5	35.3**
Average FY98-FY03	102.45	61.1	47.2

Source: Data from 1) USFS Region 10: Timber Cut and Sold Reports; 2) USFS Region 10: Periodic Timber Sale Accomplishment Report, FY 2003; and 3) USFS Region 10 Economist Guy Robertson.

* Reflects market distortion resulting from indirect federal subsidies (i.e. funneling of federal funds through Ketchikan Gateway Borough to Gateway Forest Products enabled Gateway to purchase substantial volume of timber before it declared bankruptcy and closed.)

** Reflects a deduction of 16.0 mmbf from the FY2003 Cut and Sold report volume of 51.3 mmbf. The 16.0 mmbf was cut by Ketchikan Public Utilities for the Swan Lake-Tyee powerline right-of-way. If not for the right-of-way clearing, the volume cut probably would have been only about 35 mmbf.

Exhibit 4 Page 1 of 1



United States
Department of
Agriculture

Forest
Service

Alaska Region

P.O. Box 21628
Juneau, AK 99802-1628

File Code: 2450-3
Route To:

Date: March 28, 2002

Subject: Timber Sale Contract Extensions

To: Chief

Your approval is needed on my request to extend all Alaska Region timber sale contracts for a period of three years, not to exceed a contract length of ten years. This can be done as follows:

Contract Extensions: Upon finding of public interest and request from a purchaser, contracting officers will extend each timber sale contract date up to 3 years. Authority to extend a contract is contained in 36CFR223.115, "The term of any contract or permit shall not be extended unless the approving officer finds...(b) that the substantial public interest justifies the extension."

Adjusting Periodic Payment Dates: Adjusting periodic payment dates will be consistent with 36CFR223.50. Under 36CFR223.50(b)(1)(e), periodic payment dates may be extended when the contract term is adjusted under 36CFR223.46, but "shall not be adjusted when the contract term extension is granted under the general authority of 36CFR223.115."

For contracts in existence prior to the closure of KPC's pulp processing facilities (March 1997), extended contracts will allow for the extension of periodic payments under the provisions of 36CFR223.46, i.e. "Timber sale contracts may provide for the adjustment of the termination date to provide additional time to compensate for delays...which include but are not limited to acts of God, acts of the public enemy, acts of the Government..." The early closure of the pulp mill is an act of the Government changing the market conditions and additional time is appropriate to locate processing facilities to allow utilization of pulp and utility material.

For contracts made after the closure of the KPC pulp processing facilities, purchasers will be required to make the final periodic payment. However, based upon a request by the purchaser, Forest Service will enter into a contract breach remedy by purchasers' agreement to pay interest on the unpaid periodic payment balance until such time that cash is needed in advance of cutting.

My finding of overriding public interest is based upon the following items:

1. In order to comply with the Tongass Timber Reform Act "seek to meet demand" requirement, the Forest Service needs to find solutions to maintain an economically viable timber sale program, which includes keeping volume under contract for future harvesting. There are issues with the Tongass Forest Plan Revision litigation that will make replacing defaulted volume a daunting task.
2. After reappraisal of most timber sales under contract, 90-95 percent of the timber sales are not economically viable in today's market. If purchasers were forced to log the timber sales under contract, they would be forced into default. Currently, Gateway



Caring for the Land and Serving

Exhibit 5 Page 1 of 2 -

Taxpayer Losses and Missed Opportunities:

How Logging and Road Building in the
Tongass National Forest
Costs Taxpayers Millions

*A Report by the
Southeast Alaska Conservation Council
2003*

The Southeast Alaska Conservation Council (SEACC) is a coalition of 18 volunteer conservation groups in 14 Southeast Alaskan communities surrounded by the Tongass National Forest. SEACC's members include small-scale wood product manufacturers, commercial fishermen, Native Alaskans, sportsmen and women, and others who want to safeguard the Tongass' world-class environment while providing for the sustainable use of the region's resources. For information contact us at 419 Sixth Street, Suite #200, Juneau, Alaska 99801, (907) 586-6942, or www.seacc.org

Exhibit 6

Executive Summary

- The Federal Government wastes millions of dollars every year laying out timber sales and building logging roads on the Tongass National Forest in Alaska's world-famous Inside Passage. Since 1982, American taxpayers have lost almost one billion dollars on the Tongass timber program. These taxpayer subsidies directly benefit private timber companies that are logging the world's largest intact temperate rainforest.
- Despite these chronic taxpayer losses, the number of Tongass timber jobs continues to nosedive in the face of changing world markets. Last year, taxpayers paid more than \$178,000 for each direct Tongass timber job.
- The Forest Service spends millions of taxpayers dollars every year building "roads to nowhere." Many of these roads go nowhere except to big stands of publicly owned timber. Timber companies use these roads to haul away the timber but then the Forest Service virtually abandons the roads because it can't afford to maintain them.
- The timber sales the Forest Service does sell are sold with little competition at prices that do not reflect their total cost to produce. More than 52 percent of the timber sales between 1998 and 2001 only had one bidder. Without bidding competition, timber companies have no reason to pay above a minimum rate, far below actual timber sale preparation costs. Taxpayers end up paying the difference.
- While the timber industry and its political supporters blame environmental groups for taxpayer losses on the Tongass, of the \$414 million the Forest Service spent on the Tongass timber program (including road maintenance) from 1991 to 2002, only \$1.6 million - *less than one-half of one percent* - was spent on appeals and litigation.
- The Tongass timber industry has plenty of timber. At the end of July 2003, the timber industry had nearly 300 million board feet of timber (mmbf) under contract or available, free and clear of litigation, that could be cut at any time. This amounts to a 6-year supply of timber at the 10-year average annual independent logging level and over a 4-year supply at the 20-year level.
- Loss of markets for Tongass trees is the timber industry's real problem. Actual market demand for Tongass trees has fallen dramatically because of permanent and fundamental changes in world timber markets and increased competition from timber producers in Canada, Russia, and other countries.
- Timber markets are so low that the Forest Service estimates that 90 to 95 percent of all existing timber contracts are unprofitable. In fact, in 2002 the Forest Service gave timber companies a blanket three-year contract extension to allow them to hold on to timber rather than cut it at a loss. Now the timber industry is seeking special 10-year contracts so they can delay logging even longer until the "price is right" to cut.
- The Forest Service dramatically overestimates market demand for Tongass timber. While timber companies cut only 34 million board feet in 2002 and a number of timber

Taxpayer Losses and Missed Opportunities: How Tongass Rainforest Logging Costs Taxpayers Millions

The 17-million acre Tongass National Forest of Southeast Alaska is the largest intact temperate rainforest remaining in the world and one of the earth's most incredible landscapes. Owned by the American people, the Tongass is managed by the U.S. Forest Service. The islands and waters of the Tongass support bears, eagles, wild salmon, and whales like nowhere else in the world. Hundreds of thousands of Americans visit the Tongass rainforest and Inside Passage every year.

Unfortunately, the federal government wastes millions of taxpayer dollars every year logging the Tongass rainforest. Timber companies pay the government a fraction of what it costs taxpayers to prepare timber sales. In fact, the Forest Service pays private companies to build logging roads into pristine areas to haul away public timber at dirt cheap prices. The Forest Service also wastes millions of taxpayer dollars subsidizing timber sales for which there is little or no demand. Many sales go unsold.

The private timber companies benefiting from these huge taxpayer subsidies say the subsidies are needed to provide jobs in the timber industry. But investigative research shows that while the subsidies continue to grow, employment in Alaska's timber industry has declined dramatically because of increased competition in world timber markets. These companies also export huge volumes of trees (and associated jobs) to Asia and the Pacific Northwest without any processing or manufacturing in Alaska.

Taxpayers continue to spend far more money every year laying out new logging sales for the timber industry than they do helping other users of the Tongass. This is true even though recreation and tourism businesses, commercial and sport fishermen, and hunters, generate far more jobs and earnings in the regional economy than the timber industry.

If the Forest Service really cared about creating jobs in Alaska, it would change its spending habits. It would stop squandering trees and taxpayer dollars trying to rebuild a timber industry in decline because of global economic forces. It would identify growing sectors of Southeast Alaska's economy and invest more in tourism and recreation, commercial fishing, and environmental restoration. It would create incentives to reduce the export of raw unmanufactured logs. It would also adopt a logging schedule that responds to actual demand for Tongass timber and protects an environment important to the American people and Alaskans, including tourism and recreation businesses, commercial fishermen, hunters, and subsistence users.

pleted.¹⁴ In 2000, Senator Stevens appropriated \$4 million to help the Sealaska Corporation develop a timber-related ethanol facility in Southeast Alaska.¹⁵ An independent economic analysis showed the proposal to be a highly risky investment using commercially unproven technology.¹⁶

Senator Stevens also has directed millions of taxpayer dollars specifically to help Tongass communities deal with the fundamental changes affecting the Tongass timber industry. In 1996, Senator Stevens sent \$110 million in federal tax dollars directly to Tongass communities for economic assistance.¹⁷ He added an additional \$22 million in community aid in 1999.¹⁸

The Midway Road Boondoggle

The Forest Service spent \$2.7 million building the Midway Road on the Tongass.¹⁹ The only use of the road is to access unsold old-growth timber for logging. The Forest Service has tried to sell the timber twice, once before building the road and once afterward. Both times the Forest Service failed to find a buyer.

As of this report, the timber at the end of the new road remains unsold. Even if the Forest Service eventually succeeds in selling it, the government will be unable to recover the full taxpayer cost of building or maintaining the road.

B. Building Roads to Nowhere

Taxpayers spend millions of appropriated dollars every year designing and laying out “roads to nowhere” throughout the Tongass. In 2002, the Forest Service spent millions of appropriated dollars building roads that go nowhere except to stands of publicly owned old-growth rainforest. Private timber companies then use these roads to haul away public timber for their own profit.

The Tongass already has a 5,000 mile road system,²⁰ enough roads to drive from Seattle to Miami and then north to Boston. Because of the Tongass’ many islands, only 800 miles of the existing logging road system are accessible by ferry or communities, the rest are largely abandoned logging roads.²¹

Despite the high cost, the Forest Service shows no sign of slowing its road building. Although the Forest Service states “[r]oads pose the greatest risk to fish resources on the Tongass,”²² it still plans to build another 1,065 miles of new logging roads over the next decade, enough roads to drive from Boston to St. Louis.²³ Over the next fifty years, it plans to build 2,800 more miles of roads, increasing the miles of existing roads by more than 50 percent.²⁴

While it continues to build new roads, the Forest Service is unable to maintain its existing logging road system. The agency has an estimated road maintenance backlog in Southeast Alaska of nearly \$100 million dollars.²⁵ For example, the Forest Service and Alaska Department of Fish and Game (ADF&G) have identified more than 1,500 stream culverts (the metal pipes under roads) that fail to meet standards for allowing salmon and other fish to swim under the logging roads.²⁶ These problems should be fixed before the Forest Service builds expensive new roads into pristine and controversial areas of the Tongass.

Because of its high costs, questionable returns, and environmental impacts, the building of new logging roads into pristine areas is highly controversial at both the national and local levels.

The Tongass Needs Roadless Area Protection

Many of these new logging roads are planned for pristine wildlands currently protected by the 2001 Roadless Area Conservation Rule. This rule safeguards the largest blocks of unprotected old-growth temperate rainforest remaining in the world. These lands are also important for community hunting, fishing, commercial fishing, subsistence, recreation, and tourism use. If the Bush Administration succeeds in its efforts to override strong public support for the Roadless Rule and eliminates protections for Tongass roadless areas, the cost to taxpayers and the environment will only grow.

C. Noncompetitive Bidding

The majority of timber sales the Forest Service sells on the Tongass National Forest only have one bidder.²⁷ Without bidding competition, timber companies have no reason to pay above a minimum rate, far below actual timber sale preparation costs. Taxpayers end up paying the difference.

The Forest Service also spends millions of dollars preparing timber sales that no one buys. Between 1998 and 2001, the Forest Service failed to sell 30 percent of the timber sales it spent tax dollars to prepare and offer.²⁸ (See Figure 3)

The timber industry and its political supporters are now pressuring the Forest Service to create special long-term timber contracts that would allow timber companies to hang on to standing timber for up to 10 years until the "price is right" to cut. Time will tell whether these special contracts will enhance competition among the industry players that potentially could result in reduced taxpayer subsidies. If past experience with long-term contracts is any indication, taxpayers shouldn't count on obtaining relief. During the era of the two fifty-year monopoly pulp timber contracts that ruled the Tongass from 1954 until 1997, taxpayers paid hundreds of millions in subsidies so that the multi-national timber companies could buy Tongass rainforest trees at non-competitive, bargain-basement prices.

Environmental reviews of timber sales under the National Environmental Policy Act (NEPA) are important because they identify and document the harmful effects that logging projects have on salmon, bear, deer, and other fish and wildlife habitat. Additionally, they provide local citizens and other Americans opportunities to comment on proposed sales. The cost to the Forest Service to do these critical environmental reviews is nearly one and a half times less than the cost for timber sale preparation, administration, and engineering support.³⁰

Efforts to hold the Forest Service accountable for compliance with federal and state laws are also not to blame. Of the \$414 million the Forest Service spent on the Tongass timber program (including road maintenance) from 1991 through 2002, only \$1.6 million - *less than one-half of one percent* - was spent on appeals and litigation.³¹

Logging on lands owned by the State of Alaska, that receive far less environmental protection and oversight than the Tongass National Forest, also loses money. In fiscal year 2002, the State of Alaska spent \$9,900,200 on its timber program.³² These sales returned just \$446,700.³³

III. Timber Jobs Decline Despite Huge Subsidies

Justified on the basis of providing jobs, the Tongass timber program continues to provide fewer and fewer employment opportunities for Southeast Alaskans. Despite large taxpayer subsidies, the Tongass timber industry has continued to lose jobs in the face of tough world competition, unforgiving world timber markets, and fundamental timber market changes.

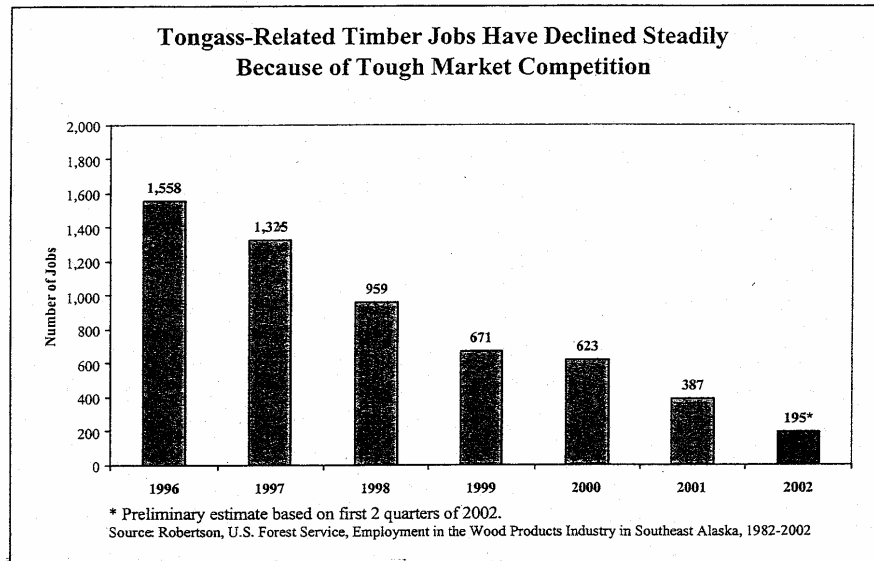
A. The Tongass Timber Industry has Plenty of Timber

Despite its persistent claims to the contrary, the Tongass timber industry continues to be flush with both timber and taxpayer cash.

At the end of July 2003, the timber industry had nearly 300 million board feet of timber (mmbf) under contract or available, free and clear of litigation, that could be cut at any time.³⁴ This amounts to a 6-year supply of timber at the 10-year average annual independent logging level and over a 4-year supply at the 20-year level.³⁵ To put things in perspective, one million board feet of timber would cover one acre, two feet deep, or provide enough lumber to build 120 houses.³⁶ (See Figure 4)

In May 2003, the Alaska Department of Labor predicted a continued decline in timber jobs: “[l]ow prices for milled timber, the uncertainty concerning the success of Silver Bay’s* [bankruptcy] reorganization plans, a national glut of timber, and sharp Canadian competition all point to continuing erosion in the logging and wood products industries.”⁴¹ (See Figure 5)

Figure 5



C. Markets and the Pulp Mills

By 1997, Alaska’s two pulp mills had closed their doors, even though both had significant timber supplies at their disposal.⁴² In fact, the Ketchikan Pulp Company continued to log Tongass timber already approved for its use for three years after it shut down its pulp mill.

Several factors contributed to these mill closures, including worldwide competition, high worldwide pulp inventories, and declining pulp prices. The competition came from newer, larger, and more efficient pulp mills in South Africa, Brazil, and elsewhere.⁴³ In a quarterly report filed with the Securities and Exchange Commission, Louisiana-Pacific Corporation stated: “[l]arge worldwide pulp inventories at the end of 1995 have carried through the first six months of 1996, creating very weak pulp markets.”⁴⁴ According to the Forest Service, “[w]orld spot markets from rayon-grade dissolving pulp dropped as low as \$500-\$600/metric ton compared with 1995 prices as high as \$1300-\$1400.”⁴⁵

* Silver Bay Logging, Inc. is an independent logging operator and mill owner in Wrangell, AK.

E. The Forest Service Inflates Market Demand for Tongass Timber

While timber markets have permanently and radically changed, the Forest Service continues to ask for and receive more money to produce more timber sales as if nothing has changed.

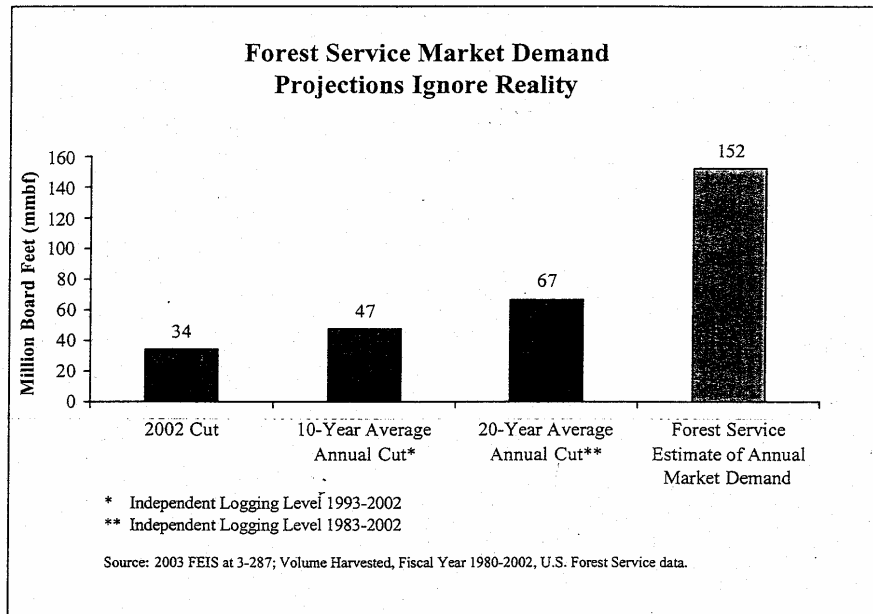
Fiscal year 2002 saw one of the lowest logging levels on record—just 34 million board feet—the lowest level since 1940.⁵⁵ Yet, the Forest Service continues to use a flawed economic model to argue that market demand for timber on the Tongass is 152 million board feet,⁵⁶ a logging level reached by independent loggers just twice in the last twenty years.⁵⁷ (See Figure 7)

The Forest Service's estimate of market demand is important because the Forest Service uses this estimate to justify its annual request to Congress for funding. The higher the estimate of market demand, the more money the Forest Service gets for timber sales on the Tongass, even if the estimate flies in the face of reality.

Trying to meet the Forest Service's unrealistic estimate of market demand for timber costs tens of millions of taxpayer dollars a year. It also forces the Forest Service to lay out timber sales and build roads in highly controversial areas. These include roadless areas that are important to many other users of the Tongass.

Nevertheless, the timber industry and its political supporters want the Forest Service to provide 360 million board feet of timber a year.⁵⁸ This amount is more than twice the Forest Service's

Figure 7



IV. Future Investments: Where Should They Go?

Is Southeast Alaska getting the biggest bang for the taxpayer buck? Given the huge subsidies federal taxpayers are sending to Southeast Alaska, is the region making the best of these public investments? Are the subsidies supporting jobs and an investment in the region's long-term future, or are they an expensive attempt to hold on to a past that no longer exists?

Today, taxpayer subsidies on the Tongass largely benefit a declining industry that provides few jobs and economic benefits compared to other sectors of the region's economy. These subsidies also fund activities that are controversial in the region and across the country because they degrade one of the world's rarest and most valued landscapes.

These subsidies could provide more jobs and do less environmental damage if they were invested in smarter ways. Tourism, recreation, and environmental restoration are a few of the many examples for how these funds could be better invested. Other possibilities include the marketing of Alaskan salmon and high value-added wood products.

A. Tourism and Recreation in the Inside Passage Continue to Grow

While the timber industry is declining and providing increasingly fewer jobs in Southeast Alaska, tourism and recreation continue to grow.

Cruise ships alone brought an estimated 632,000 visitors to Southeast Alaska in 2000, compared to 235,000 visitors in 1990.⁶⁸ The number of clients using outfitters and guides has also climbed sharply during the last decade. Outfitter/guide clients increased from approximately 1,550 in 1994 to 14,000 in 1999, an increase of 800 percent in five years.⁶⁹

The growth of recreation and tourism is a national trend. According to the Forest Service's 2000 Strategic Plan, by far the largest economic activity in the National Forest System is recreation use,^{*} followed by hunting, fishing, and wildlife viewing. Timber holds a distant 3rd place.⁷⁰

This Plan also shows that, in 1999, recreation use in National Forests represented 64 percent of the total dollar amount of National Forest resource outputs.[†] The category of hunting, fishing and wildlife viewing represented another 16 percent of those outputs. Together these two recreational categories made up 80 percent of all national forest resource outputs when measured in terms of their dollar values. In contrast, timber was responsible for just 11 percent. Mineral and energy extraction equaled 7 percent.

In terms of employment, the Plan showed that the impact of recreation was greater still. The two recreational categories made up 85 percent of jobs produced; the two resource extraction categories just 13 percent.

^{*} In the Strategic Plan, "recreation use" includes all recreation activities except hunting, fishing, and wildlife viewing.

[†] "Output" is defined as "measurable goods, end products, or services resulting from management activities that are purchased, consumed or used directly by people." See U.S. Forest Service *Final Supplemental Environmental Impact Statement Roadless Area Evaluation for Wilderness Recommendations*, February 2003, p. 7-15.

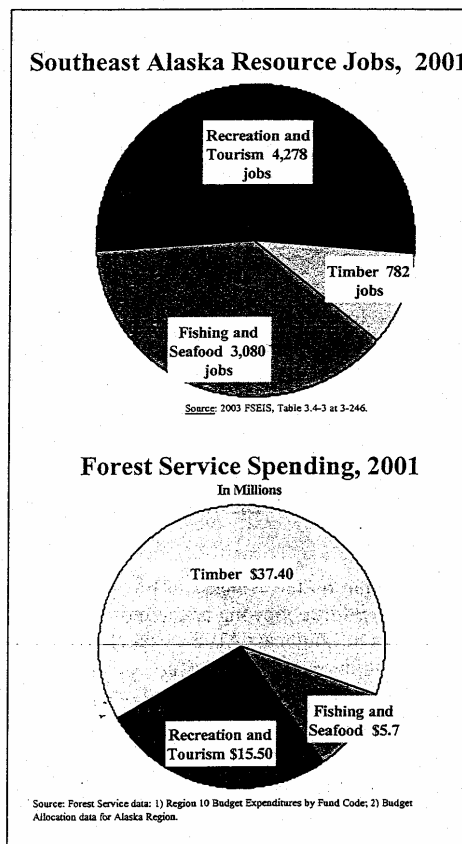
C. The Forest Service is Failing to Respond to Changes in Alaska's Economy

While the Forest Service prides itself on being a multiple-use agency, it's not a multiple-use subsidizer. Tourism, recreation, and commercial fishing provide far more jobs and economic benefits to the region than the timber industry, but they are clearly lower Forest Service funding priorities.

The agency consistently spends two and a half times more money on Tongass logging and logging roads than it does on tourism and recreation.⁷⁸ Similarly, it spends four times more each year on logging and road building than it does on fish and wildlife management activities.⁷⁹ (See Figure 9)

The Forest Service has starved its recreation program over the last decade. While the need to plan and manage tourism and recreation growth has grown dramatically on the Tongass, the agency's recreation budget has stagnated. In fact, while the number of clients using outfit-

Figure 9



Taxpayer Losses and Missed Opportunities
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to spend in the state during their trip, the longer they were likely to stay, and the greater the chance that they would visit more than one region of the state.⁹⁰

Subsistence, similarly to wildlife viewing and sport hunting and fishing, depends upon healthy fish and wildlife habitat. Providing important cultural and nutritional benefits to Alaskans, especially those in rural areas, subsistence also generates essential non-income benefits to rural economies. Residents of rural areas of Southeast Alaska annually harvest an estimated 178 lbs. of wild subsistence foods per person.⁹¹ Much of this food is taken from the Tongass. While economists acknowledge the difficulty in measuring the economic value of subsistence activities, a conservative method using a replacement cost of \$5 per pound sets the value of subsistence foods to rural Southeast Alaskans at over \$25 million per year.⁹² This value increases to over \$160 million when a standard valuation method that assesses net willingness to pay to engage in subsistence is used.⁹³

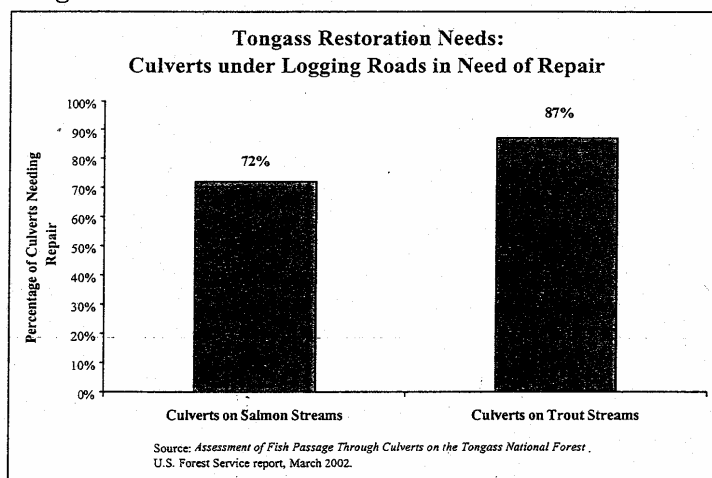
Healthy ecosystems, beautiful scenery, and the fish and wildlife they produce generate millions of dollars a year for Southeast Alaskans and help sustain the region economically.

E. Putting People to Work Restoring the Environment

The Forest Service has unique opportunities to invest in projects that will employ hard-working Alaskans doing skilled work to restore the environment and protect natural resources important to the region's economy. The Tongass has huge environmental restoration needs.

The Forest Service and ADF&G have identified more than 1,500 stream culverts that do not pass the Forest Service standards for allowing fish to swim through.⁹⁴ The culverts are too steep or the end of the pipe is hanging too far above the water for fish to move up and down streams to reach critical habitat. To protect Alaska's rich salmon and trout fisheries, these culverts need to be replaced or repaired as soon as possible. (See Figure 10)

Figure 10



G. Investing in the Future, Not the Past

Southeast Alaska's economic landscape has changed dramatically over the last decade, and it will likely continue changing in the future. If the Forest Service is interested in helping provide jobs in Southeast Alaska, it must begin to invest more in the future.

Unfortunately, the Forest Service remains stuck in the past. The Forest Service and its political supporters continue to measure "success" by the number of large old-growth trees the timber industry cuts down, rather than the total number of jobs the Forest Service helps provide. If the Forest Service really cared about jobs, it would be making much different investment decisions.

By continuing to expend huge federal subsidies on the timber program and failing to increase its investments in other growing sectors of Southeast Alaska's economy, the Forest Service is missing important opportunities to create more jobs and promote economic growth in the region. It is also missing opportunities to provide more jobs with less impact on the Tongass' world class environment.

The Forest Service could generate more jobs and income in Southeast Alaska if it invested more in tourism, recreation, restoration, and smaller scale, value-added manufacturing. The Forest Service could invest in expanding its visitor facilities, building and maintaining campgrounds, building and maintaining Tongass trails, replacing culverts that block fish passage, and planning for tourism and recreation growth. These investments would benefit local Southeast Alaskans as well as the hundreds of thousands of Americans who visit the famed Inside Passage every year.

Small-scale, value-added wood products manufacturing, government, and commercial fishing will also continue to play key roles in Southeast Alaska's economy, as will other economic sectors that share what is special and unique about Alaska in a way that is competitive with world markets.

This is not to suggest that tourism, recreation, restoration, and value-added manufacturing should be the only areas in which the Forest Service invests. Indeed, tourism and recreation, for example, bring their own impacts to communities and the environment, impacts that citizens of the Tongass will have to work together to balance.

However, this report makes clear that there are many opportunities for the Forest Service and Alaska's political leaders to do a much better job of providing jobs to Southeast Alaskans. Making smarter investments would help the region's communities avoid the boom and bust economy of the past, diversify their economies, and support a vibrant, balanced, and increasingly sustainable economy on the Tongass.

Endnotes

¹ Total loss for fiscal years 1982 through 2002 is \$750,065,582. Loss is calculated as the difference between the value of cut timber and the expenditures for timber management, road construction, and other line items referable to timber preparation and sale costs; expenditures for road maintenance are not included unless otherwise noted. Calculations are based upon data from U.S. General Accounting Office (GAO), Congressional, and U.S. Forest Service sources, available upon request from SEACC.

² Guy Robertson, Regional Economist, *R10 Budget Expenditures by Fund Code* U.S. Forest Service data for Alaska Region, in response to SEACC FOIA request of December 2002.

³ *Timber Cut and Sold on National Forests, Region 10 Fiscal 2002* report, from U.S. Forest Service Alaska Region Reports and Policies webpage: http://www.fs.fed.us/r10/ref_reports/reports.shtml. Receipts cited are for value of Tongass cut timber.

⁴ U.S. Forest Service *Final Supplemental Environmental Impact Statement Roadless Area Evaluation for Wilderness Recommendations* (February 2003) [hereinafter 2003 FSEIS], see notes to Table 3.4-23 p. 3-299.

⁵ Calculation based upon data from: 1) Guy Robertson, U.S. Forest Service, *Employment in the Wood Products Industry in Southeast Alaska, 1982-2002* data provided to SEACC, May, 2003. FY02 data is an estimate based on the first 2 quarters of 2002. 2) Guy Robertson, Regional Economist, *R10 Budget Expenditures by Fund Code*, U.S. Forest Service data for Alaska Region, in response to SEACC FOIA request of December 2002, and 3) *Timber Cut and Sold on National Forests, Region 10 Fiscal 2002* report.

⁶ U.S. Forest Service: Distribution of Timber-Sales Receipts Fiscal Years 1992 - 1994, September 1995, GAO/RCED-95-237 FS, p. 51

⁷ U.S. Forest Service: Distribution of Timber-Sales Receipts – FY 1995 - 1997, November 1998, GAO/RCED-99-24, p. 41

⁸ Conf. Rep. No. 105-825, on H.R. 4328, Omnibus Appropriations bill FY99 105th Cong., 2d Sess. (1998), p. 1219.

⁹ Conf. Rep. No. 106-479, on H.R. 3194, FY2000 Consolidated Appropriations bill 106th Cong., 1st Sess. (1999), p. 488.

¹⁰ Dep't of the Interior and Related Agencies Appropriations Act, 2001, Pub. L. No. 106-291, 114 Stat. 922, 968.

¹¹ Dep't of the Interior and Related Agencies Appropriations Act, 2002, Pub. L. No. 107-63, 115 Stat. 414, 445.

¹² Consolidated Appropriations Resolution, 2003, Pub. L. No. 108-7, 117 Stat. 11, 251.

¹³ Agreement Made and Entered into the 21st Day of February, 1997, by and between the United States; United States Department of Agriculture, Forest Service; Ketchikan Pulp Company and Louisiana-Pacific Corporation; Pers. Comm. Buck Lindekugel, SEACC with U.S. Forest Service Region 10, Office of General Counsel (June 5, 2003).

¹⁴ 1999 Emergency Supplemental Appropriations Act, Publ. L. No. 106-31, 113 Stat. 57, 90.

¹⁵ Two million dollars were appropriated in each of these 2 bills: Conf. Rep. No. 106-914, on H.R. 4578, Dep't of Interior and Related Agencies Appropriations Act, 2001, 106th Cong., 2d Sess. (2000), p. 157; Conf. Rep. No. 106-988, on H.R. 4635, Dep't of Veterans Affairs and Housing and Urban Dev., and Indep. Agencies Appropriations Act, 2001, 106th Cong., 2d Sess. (2000), p. 266.

¹⁶ L. Scott Trainum, *Report on Feasibility: Ethanol Plant Development in Southeast Alaska*, 2000, p. 9.

¹⁷ Omnibus Appropriations Act of 1996, Pub. L. No. 104-134, 110 Stat. 1321-182.

¹⁸ FY2000 Consolidated Appropriations bill, Pub. L. No. 106-113, 113 Stat. 1501A-177

¹⁹ U.S. Forest Service Contract Number 50-0109-2-61300, Midway Road Construction, issued April 30, 2002.

²⁰ 2003 FSEIS, *supra* note 4, Table 3.3-15, p. 3-109.

²¹ *Alaska Forest Roads*, updated June 14, 2002, in U.S. Forest Service Alaska Region Briefing Book 2002.

²² 2003 FSEIS, *supra* note 4, p. 3-25.

- ⁴⁷ Quarterly Form 10-Q Report, Commission File Number 1-7107 for the period ending June 30, 1996, p. 10. Available at: <http://www.sec.gov/Archives/edgar/data/60519/0000892917-96-000233.txt>
- ⁴⁸ Pers. Comm., Mark Suwyn, LP CEO, July 29, 1996.
- ⁴⁹ Alaska Pulp Corporation Consolidated Balance Sheet, March 31, 1993.
- ⁵⁰ Memorandum from Steve Brink, Deputy Regional Forester for Natural Resources, to Chief of the U.S. Forest Service (March 28, 2002) (explaining a finding of overriding public interest in contract extensions).
- ⁵¹ Notice of Extension of Certain Alaska Timber Sale Contracts, 67 Fed. Reg. 51165-67 (August 7, 2002).
- ⁵² Memorandum from Dale Bosworth, Chief of the Forest Service, to Mark Rey, Under Secretary, Natural Resources and Environment, (undated), explaining contract extensions.
- ⁵³ Guy C. Robertson and David J. Brooks, *Assessment of the Competitive Position of the Forest Products Sector in Southeast Alaska, 1985-94*, Gen. Tech. Rep. PNW-GTR-504, U.S. Forest Service, Pacific Northwest Research Station (2001). Available at: <http://www.srs.fs.usda.gov/pubs/view-pub.jsp?index=2926>.
- ⁵⁴ U.S. Forest Service data provided in response to a FOIA request by Taxpayers for Common Sense (2002).
- ⁵⁵ *Timber Cut and Sold, Region 10 Fiscal Year 2002* report from USDA Forest Service Alaska Region Reports and Policies webpage: http://www.fs.fed.us/r10/ref_reports/reports.shtml; U.S. Forest Service *Tongass Land Management Plan Revision Final Environmental Impact Statement*, January 1997, Table 3-73, p. 3-259.
- ⁵⁶ 2003 FSEIS, *supra* note 4, Table 3.4-15, p. 3-287.
- ⁵⁷ Guy Robertson, *Volume Harvested in Million Board Feet, Fiscal Year 1980-2002*, U.S. Forest Service data for Alaska Region, in response to SEACC FOIA request of December 2002.
- ⁵⁸ Alaska Governor Frank Murkowski, The State of the State Address, January 23, 2003.
- ⁵⁹ Calculation based upon the following data: 5.3 billion board feet have been logged on the Tongass from FY82 through FY02 (*see* Guy Robertson, *Volume Harvested in Million Board Feet, Fiscal Year 1980-2002*, U.S. Forest Service data for Alaska Region, in response to SEACC FOIA request of December 2002); \$750,065,582 has been lost from FY82 through FY02 (*see* methodology described in note 1). Using these figures, the Forest Service has lost \$141,175/mmbf of timber cut on the Tongass since 1982. At this historical rate of loss, cutting 360 mmbf yearly will cost taxpayers \$50,823,000 each year.
- ⁶⁰ Memorandum from Steve Brink, Deputy Regional Forester for Natural Resources, to Chief of the U.S. Forest Service, (March 28, 2002).
- ⁶¹ Data from: 1) Guy Robertson, U.S. Forest Service, *Tongass National Forest Log Exports CY 1997-2001*, data provided to SEACC, June, 2003; 2) *Timber Cut and Sold on National Forests, Region 10 Fiscal 2001* report; and 3) *Timber Cut and Sold on National Forests, Region 10 Fiscal 2000* report. Cut and Sold reports are available at U.S. Forest Service Alaska Region Policies and Reports webpage: <http://www.fs.fed.us/r10/ro/policy-reports/>.
- ⁶² Guy Robertson, U.S. Forest Service, *Exports of Softwood Logs and Lumber from Alaska (Anchorage Customs District), CY 1988-2001*, data provided to SEACC, May, 2003.
- ⁶³ Export data from: Guy Robertson, U.S. Forest Service, *Tongass National Forest Log Exports CY 1997-2001*, data provided to SEACC, May, 2003; cedar harvest data from: Bill Wilson, *Cedar Harvest on the Tongass National Forest (1997-2001)*, March 18, 2002, p. 3.
- ⁶⁴ U.S. Forest Service, *Kuakan Timber Sale Record of Decision and Final Environmental Impact Statement*, March 2000, p. 2-2.
- ⁶⁵ U.S. Forest Service, *Cholmondeley Timber Sales Final Environmental Impact Statement*, April 2003, p. 3-87.
- ⁶⁶ David Katz, *Modeling a Small-Scale Secondary Manufacturing Timber Industry for Southeast Alaska*. SEACC (1997), p. 1.
- ⁶⁷ Guy Robertson, U.S. Forest Service, *Tongass National Forest Log Exports CY 1997-2001*, data provided to SEACC, May, 2003.

⁸⁹ Lana C. Shea, *Impacts of Development on the Non-hunting, Wildlife-oriented Businesses of Southeast Alaska*, ADF&G Habitat Division, April 5, 1990, p. 4.

⁹⁰ SuzAnne M. Miller and Daniel W. McCollum, U.S. Forest Service Rocky Mountain Research Station, *Less May Mean More: Maximizing the Economic, Environmental, and Social Benefits from Alaska's Visitors Industry*, in proceedings of Alaska Sustainable Future Conference, sponsored by the Alaska Conservation Alliance, July 22, 1999.

⁹¹ ADF&G, Div. of Subsistence, *Subsistence in Alaska: A Year 2000 Update* (March, 2000), Figure 5, p. 2. Available at: <http://www.state.ak.us/adfg/subsist/download/subupd00.pdf>.

⁹² *Id.* Figure 6, p. 3. Note that this source shows that, in addition to the wild food harvested by rural subsistence users, urban residents of Juneau and Ketchikan harvest 1.4 million pounds of wild food. Using the methodology described in the text, this additional amount of wild food has a value of between \$7 million and \$45 million.

⁹³ Steve Colt, *The Economic Importance of Healthy Alaska Ecosystems*, January 2, 2001, p. 37. Available at: http://www.iser.uaa.alaska.edu/ResourceStudies/healthy_ecosystems.pdf.

⁹⁴ *Assessment of Fish Passage Through Culverts on the Tongass National Forest*. U.S. Forest Service, March, 2002, Table 2.

⁹⁵ Memorandum from Fred Salinas, Acting Forest Supervisor, to Regional Forester, Region 10, U.S. Forest Service, re: *Tongass Ten Year Fish Pipe Replacement Plan*. (May 31, 2002). Plan states \$25,000 average cost per site.

⁹⁶ *Fish Passage on Alaska's National Forests*, updated June 24, 2002, in U.S. Forest Service Alaska Region Briefing Book 2002.

⁹⁷ 2003 FSEIS, *supra* note 4, p. 3-107.

⁹⁸ U.S. Forest Service 2002 Road Deferred Maintenance report, in response to SEACC FOIA request of October 10, 2002.

⁹⁹ Data from Dan McMahon, U.S. Forest Service civil engineer, in response to SEACC FOIA request of June 6, 2002.

¹⁰⁰ U.S. Forest Service data from Shirley Cole, in response to SEACC FOIA request of October 10, 2002.

¹⁰¹ U.S. Forest Service Budget Allocation data for Alaska Region, in response to SEACC FOIA request of July 2002.

Couverden Timber Sale still fleeces taxpayers

On July 23, the Forest Service published in the Federal Register its intent to cut an estimated 25 million board feet of timber in its proposed Couverden Timber Sale, about midway between Gustavus and Juneau.

Logging at Point Couverden has an expensive history. In the mid-1980s the 55 million board feet Point Couverden Timber Sale

achieved a certain notoriety when Sen. William Proxmire gave his "Fleece of the Month" award jointly to the Forest Service and Congress, and stated, "At Couverden in 1984 and 1985 the Forest Service spent over \$5.5 million putting in almost 30 miles of roads and eight bridges in advance of a timber sale which drew no bidders."

When the Forest Service finally found a buyer for the timber (the now-defunct Alaska Pulp Company), its price was reduced to rock-bottom "base rates" - the lowest price for which the Forest Service can legally sell timber, which put its total value at about \$113,000 - barely 2 percent of what the Forest Service had spent building roads.

What will the economics look like for this proposed sale? To prepare and administer a timber sale on the Tongass the Forest Service spends about \$100 of the public's money per 1,000 board feet of timber. On this proposed sale, that translates to about \$2.5 million.

The proposed sale comes at a time when the timber industry cannot even manage to sell the timber it already has under contract, a situation exacerbated by the fact that the timber at Point Couverden is mostly small hemlock. If the timber on the proposed sale is sold at base rates, the entire 25 million board feet - enough to build about 1,000 houses - will go for about \$55,000. For the timber industry

this sale might be considered "economic", but for the taxpayer it is an economic disaster.

There has been a lot of talk recently of corporate wrongdoing. If the Tongass National Forest timber program was a corporation, it would be bankrupt and shareholders would be in court charging its managers with malfeasance over activities such as the proposed timber sale at Point Couverden.

In a sense, we are all "stockholders" in our nation. It's time the Forest Service gave us stockholders a break. Losing forever the proposed industrial-scale timber sale at Point Couverden would be a good place to start.

James Mackovjak
Gustavus

JUNEAU EMPIRE, TUESDAY, SEPTEMBER 3, 2002

March 28, 2004

JUNEAU EMPIRE

Support citizens' plan

Letter to the editor

When the Forest Service began planning a new round of timber sales for the Couverden area, Gustavus residents took notice. Gustavus residents are all too familiar with the last Couverden sale. During 1984-85, the Forest Service put in almost 30 miles of road and eight bridges at Couverden, spending 5.5 million of taxpayers' dollars. The sale drew no bidders. When the Forest Service finally found a buyer, the price was reduced to base rates and garnered a mere \$113,000 (barely 2 percent). Unfortunately, the current Forest Service proposal for Couverden is doomed to a worse fate.

The current market for Tongass timber is virtually nonexistent. Sales routinely receive one, or zero, bids, and the industry recently sold 20 sales back to the Forest Service since they couldn't sell them. In the current Couverden DEIS (p. 2-12), the Forest Service admits, "none of the proposed alternatives are economically viable under current market conditions." To make this sale (which is predominantly low-grade hemlock) even remotely attractive, the Forest Service will likely sell at base rates and offer a round log export permit, guaranteeing the continued loss of millions of taxpayers' money with little, if any, benefit to the local economy. Which begs the question, "Who is the Forest Service laying out this sale for?"

Since 2002, several Gustavus residents have assembled a proposal for the Couverden area. An incomplete sketch of our proposal was included by the Forest Service as Alternative 5 in their DEIS. The premise of our alternative is that Couverden is the last chance to make some sense of timber management on public lands in our area. The eastern edge of Icy Strait is open for logging. Of that, the Forest Service and Native corporations have hammered NE Chichagof. Gustavus has little timber and most is privately owned in small parcels. Couverden is our remaining possibility on public lands. The Forest Service is off to a bad start here, allowing two poorly conceived sales that have taken a big bite out of the timber base. However, there is some timber left and a potential opportunity. Now is the time to see that the Forest Service doesn't continue to clearcut away our future options and sell them for a song to exporters, while costing the taxpayers millions.

The Gustavus Citizens Alternative attempts to make ecological and economic sense of timber management at Couverden that factors in the needs and opportunities for our region. Please check out alternative 5 in the Couverden DEIS. We'd appreciate your support. Comments are due March 29.

Paul Barnes
Gustavus

Exhibit 7 Page 2 of 2

Response to Buck Lindekugal, Southeast Alaska Conservation Council and the Wilderness Society

SEACC-1: Your comments on your organizations are noted.

SEACC-2: As you note in your comment, the Forest Service worked with the citizens of Gustavus to develop an alternative that meets their need for small sales. Alternative 5 is based on this effort.

SEACC-3: The Forest Service held meetings in Hoonah to gather information on Native use of the Couverden area, locations of specific sites that are considered to be of cultural importance, and on other concerns that the Hoonah Indian Association may have had prior to publication of the DEIS. The Forest again met with the Association in March 2004, following publication of the DEIS, to discuss their concerns.

SEACC-4: The Forest worked with the Gustavus community and met with the Hoonah Indian Association. A version of the Gustavus alternative was included in the DEIS. The preference that the Gustavus community has for small sales is recognized and is incorporated into the preferred alternative. The Hoonah Indian Association supports Alternative 1, No Action. They recommend that rather than harvesting low-value hemlock, the Forest Service should concentrate on other uses for the area, such as subsistence uses, protecting the scenery values, improving fish passage, and tourism. They also state that they would prefer to see small-scale harvest rather than large sales.

SEACC-5: We agree that the range of alternatives was “quite broad.” Thank you for pointing out that the DEIS erred in stating the proposed volume for Alternative 5 was 8 MMBF. It proposes a total sale volume of 100 to 500 MBF per year but then assumes a total volume over the decade of 8 MMBF of timber. This should have been 1 to 5 MMBF, not 8. This has been corrected in the FEIS, along with all numbers derived from using this figure and all effects tied to the larger number.

SEACC-6: At the time of this response, this Forest Plan issue of timber supply and market demand is in litigation [Case No. J03-0029 CV (JKS)]. The DEIS used the most current information available at the time the analysis was done.

SEACC-7: Updated information on timber industry employment has been included in the FEIS. Please note that, due to the time it takes to edit, print, and distribute a document of this size and complexity, the most recent published data may not be included.

SEACC-8: At the time of this response, this Forest Plan issue is in litigation [Case No. J03-0029 CV (JKS)].

SEACC-9: The monetary effects of past timber sales and of canceled sales in other areas are beyond the scope of this analysis. Harvest costs are very different today than in the past. The original Couverden sale had high costs partly because an LTF, sort yard, and camp had to be built and partly because a new road system, including bridges across major streams, had to be designed and built. Timber sale preparation costs were also increased because there were no roads, making access slow and difficult, and, therefore, expensive. The second sale also included a major expansion of the road system into the Swanson Creek watershed, which included several major stream crossings. The canceled sales were sold when timber prices were high. After prices fell, these sales were no longer viable and had to be canceled. If sold, the proposed timber sales would be sold under very different market conditions. Therefore, these past sales are not comparable with the proposed action. Timber would only be offered if market conditions were to improve and the sales were not deficit.

SEACC-10: It is not correct that the analysis in the DEIS was completed nearly two quarters into fiscal year 2004. The analysis in the DEIS was prepared in the summer and early fall of 2003. It was sent to the printer at the beginning of December. It takes time to prepare the document for publication and to have it printed. The information in the analysis was current at the time the analysis was done.

SEACC-11: At the time of this response, this Forest Plan issue of what constitutes actual market demand is in litigation [Case No. J03-0029 CV (JKS)]. It is beyond the scope of this analysis.

SEACC-12: At the time of this response, this Forest Plan issue of current mill capacity and utilization rates is in litigation [Case No. J03-0029 CV (JKS)]. It is beyond the scope of this analysis.

SEACC-13: At the time of this response, this Forest Plan issue of how the Forest Plan ROD interpreted the Brooks and Haynes draft and on how the report was used in the Forest Plan analysis is in litigation [Case No. J03-0029 CV (JKS)]. It is beyond the scope of this analysis.

SEACC-14: The most recent Appendix A has been included in the FEIS.

SEACC-15: We do not agree that none of the alternatives meet the purpose and need, which includes managing in an “economically efficient manner.” Managing in an economically efficient manner relates to meeting the objectives effectively and within budget. We are doing so. Timber markets appear to be in an upswing and we believe that our planning efforts will result in a timber sale or sales that will attract purchasers. Current timber markets appear to show that none of the action alternatives could be operated economically, though several are within the historical swings in timber markets. The alternatives respond to a variety of issues, and each alternative is measured against an economic yardstick. The purchase price of the wood coupled with the cost of transporting, harvesting, and milling the wood and moving the finished product to market should be less than the return to the purchaser for the finished product. This would allow prospective purchasers to make a profit, pay employees, and, in turn, support their communities.

SEACC-16: We are aware of your longstanding position that an economic efficiency analysis is required in project level EISs. As we have explained when this comment was made on other projects, your position is not correct. An economic efficiency analysis is required for a forest planning level analysis and a financial efficiency analysis is required for a project level EIS (FS Handbook 2409.18 section 13).

SEACC-17: Additional information on the NEAT analysis has been added to the FEIS.

SEACC-18: Utility log volume is estimated just as the sawlog volume is estimated. Utility volume within a harvest unit “counts” toward the ASQ if the intent is to harvest it, whether utility volume is removed from the sale area or not. Determinations are made on a unit-by-unit basis depending on the silvicultural, visual, riparian, or wildlife objectives to be achieved. If the objectives to be met require harvest of utility, utilization standards that identify the quality of materials required for removal from each unit will determine what timber is removed. However, logs are paid for even if the trees are left standing.

SEACC-19: We have done the economic analysis we believe is appropriate. We followed Regional direction in selecting the costs used in the analysis (refer to Forest Service Manual 2409.18). Please note that the Tongass Timber Reform Act (TTRA) requires the Forest Service to seek to meet market demand. This law enacted by Congress did not require that the Forest earn a profit or even break even in seeking to meet market demand.

SEACC-20: Information on acres harvested in all past sales in the project area is included in the Cumulative Effects section (DEIS p3-72). Information on harvest costs and returns from past sales is not readily available and has no bearing on the decision to be made.

SEACC-21: While VCU 1200 was listed in the mid-1990s as one of 86 VCUs on the Tongass with the highest community use values, the Couverden area does not receive heavy use for either subsistence or recreation. Refer to the recreation and subsistence resource reports. The waters of Icy Strait receive heavy use for both commercial, recreational, and subsistence fishing, but there is no indication that the land area does. The project area contains relatively few deer because of the harsh winter climate; therefore, little subsistence deer hunting takes place in the project area. The DEIS does contain mitigation measures that protect fish and wildlife resources (refer to Appendix B).

SEACC-22: All new roads would be closed after the project is completed and placed in storage. Culverts would be pulled or bypassed, and access would be blocked. The intention is to close the road to vehicle use; however, we acknowledge that some ATV use will occur and this was considered in the wildlife analysis in Chapter 3.

SEACC-23: The project area comprises nearly 50,000 acres, or 78 square miles, a substantial "landscape" that underwent analysis. All old-growth reserves within the project area were evaluated for consistency with Forest Plan standards and guidelines as required by the Forest Plan. The old-growth reserve in VCU 1180 was expanded as recommended by the Interagency Committee. Refer to the old-growth habitat analysis in the wildlife section of Chapter 3.

SEACC-24: All roads would be built and maintained in accordance with BMPs to ensure non-impairment of flow and circulation patterns and protect water quality, as required under the Clean Water Act. All alternatives follow the recommendations made by the Corps in regard to closing roads no longer needed for silvicultural work. Refer to the comment letter from the Corps in this appendix.

SEACC-25: The Tongass National Forest, in partnership with other agencies, is developing methodology for determining priorities to address fish passage problems. The proposed Couverden Timber Sales offer an opportunity to resolve fish passage and drainage problems as part of the road work associated with the proposed sales rather than wait for future funding.

SEACC-26: The Forest Service has an effectiveness monitoring program for BMPs, and results were reported in the 2002 Annual Monitoring Report (pages 2-107 through 2-123). Past effectiveness monitoring has concentrated on temperature and turbidity.

SEACC-27: All newly constructed roads will be removed or placed in storage upon closure. This will reduce future maintenance needs. In addition, open road mileage in the project area will be reduced to less than 30 miles, with the remainder placed in storage status with drainage structures removed.

SEACC-28: Fill will come from local rock sources. The project area contains several quarries. Fill that is removed during road closure will be stored in the quarries it was removed from or placed in a stable upland location approved for this use. This requirement has been added to Chapter 2, Items Common to All Alternatives.

✓ To Forest Supervisor

My name is Steve Little and I'm writing this in regards to the Couverden Timber Sale. I am a saw mill owner in Gustavus. I own a mity mite and mobile dimension. my livelihood is dependent upon access to timber. And it is my hope that you would consider the Couverden Sale for small timber sale. Small sales are only economical to sawyers near the sale. And this is the closest location to Gustavus. I have been in the saw mill business since 1983. started as a side line to my carpentry. Now it is 80% of my income. I went to all the Tongass reform meetings in Sitka, and hoorahed that the talk was Jippo's are back and value added was the wave of the future. I hope that it really does work. And I know that it takes us entrepreneurs to be out here pushing and filling markets and niches. I have been working towards this. I bought a 40' freezer van I am converting to a kiln. I took the class in Sitka in 99' at the UAS and received a certificate for kiln operating.

I've also been investing every spare dollar into equipment and upgrading. Lumber trucks, loaders, excavators, tug and barge. It's been a slow process to get completed doing this out of pocket. But I'm now where I can easily process 200 thousand Bd ft or more per year. And I hope that the Forest Service can provide such small sales, as private timber gets harder to come by. Sincerely Steve Little

P.S. Say hi to Mike Cruz if he's still at the service in Ketchikan. I worked for him 89'-90'.

Steve Little
Little Wood Products
PO 301 Gustavus, AK
99826

Response to Steve Little

SL-1: Your comments that you are the owner of a small saw mill in Gustavus and can handle 200 MBF of timber a year are noted, as is your support for small sales to make wood from the Couverden area available to local businesses. All action alternatives include the option of small sales; refer to the Alternatives Considered in Detail section of Chapter 2.

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cliff Lobaugh

RECEIVED

MAR 22 2004

Juneau Ranger
District

Juneau Ranger District TNF
8465 Old Dairy Road
Juneau, Alaska 99801

Re:Couverden Timber Sale Comments

The wife and I were in Italy when 9/11 developed. Immediately after it was known what happened Princess Tours, Norwegian Cruise Line, and several other international cruise lines pulled their vessels out of the Mediterranean Sea. These ships headed straight for the USA and were to be refurbished for the Alaska trade. Alaska seemed like a safe place to tour and Americans would like to go to places within the states, since Europe and the mid east were hot beds for terrorist attacks.

CL-1

Alaska abound with wildlife, a large variety of sea life, glaciers to numerous to count, the two largest National Forests in the states, and all this could be seen from the decks of the cruise ships. Juneau, the capital city of Alaska, with a population of 30,000 had over 10,000 people visiting at one time.

CL-2

These people don't come up here to see roads and clear cuts. The people come up here to see the wildlife, fish, forests, and glaciers. Building roads, and clear cuts have destroyed much of the public lands the people remembered in the lower 48 states. We presently have as many Brown Bear on Admiralty Island in the Tongass National Forest as was found by the Lewis and Clark Expedition revisited 200 years later in the lower 48 states.

Couverden Timber Sale is a taste for the future on what will happen to Juneau and the surrounding area. The two major mill operators said they were unlikely to BID because the timber was of lower value and Couverden was too far away. A mill in Hoonah said the sale was too large for him to bid on. Even the cultural and historical resources of the people from Hoonah and Gustavus will be threatened by the sale. Fishermen, hunters, and other users would be displaced. Road building and clear cuts would impact the critical view shed. The cruise ships on their way to Glacier National Park pass by the Couverden Timber Sale.

CL-3

On June 18, 1986 Senator Wm. Proxmire awarded his coveted "Golden Fleece Award" to the National Forest and the United States Congress. Senator Proxmire said, "Talk about a classic case of log rolling. The taxpayers get rolled while the timber companies get the logs." The Couverden Timber Sale exemplifies the problems with the Tongass Timber Program. In 1986 the USFS spent over \$5.5 million dollars building 30 miles of road and 8 bridges for a sales that drew no bidders. The Couverden Timber Sale was that sale. It was later sold for 2% of what it cost for the roads and access to the timber. There are over 100 more sales like this the USFS Planning process has waiting. Here in the North Tongass we can look forward to Cowee-Davies Creek Sale, St. James Bay Sale, Windam Bay Sale, and Taku Harbor Sale in the near future.

CL-4

Please answer the following questions:

1-Has the planning team lost billions of dollars on the timber sales as stated in the Golden Fleece Award?

CL-5

2-Why did the USFS not include the So. Chilkat Peninsula in one of the Alternatives on Couverden Sale as an addition to the UN International Biosphere. It was requested by the public as alternative?.

CL-6

3-Why did the USFS not take over Pt. Retreat Light House Reserve (public lands) from the USCG. Instead of letting Senator Ted Stevens giving \$15 million worth of public real estate to a fisheries lobbyist in an appropriations rider?

CL-7

4-Are you in business to make money, break even, or loose money?

CL-8

Cliff Haurgen
3340 Fitch Ave
Juneau, AK 99801

789-5028

789-9114 FAX.

Response to Cliff Lobaugh

CL-1: Your comments about the cruise ship business are noted.

CL-2: Your comments about why tourists come to Alaska are noted.

CL-3: We do not agree that the cultural and historical resources of the people from Hoonah and Gustavus will be threatened by the sale of timber. Refer to the Heritage Resource section of the FEIS.

CL-4: You are correct that the timber sale that was logged in the early 1980s lost money. It was the first entry into the area and the high road and LTF costs were not recovered through the sale of the timber.

CL-5: The press release that you submitted (dated June 18, 1986) refers to timber sale losses associated with the long-term timber contracts that guaranteed timber at low rates to pulp mills. These contracts were canceled a decade ago.

CL-6: The Forest Service did not consider adding the South Chilkat Peninsula to the UN International Biosphere as part of this project because adding the South Chilkat Peninsula to the UN International Biosphere is beyond the scope of this proposal.

CL-7: The Forest Service did not “take over” the Point Retreat Light House instead of letting Congress give it to a fisheries lobby because Congress did not authorize the Forest Service to do so. The Forest Service operates under the direction of Congress and the Administration; it does not direct Congress.

CL-8: The Forest Service is not “in business to make money, break even, or loose money.” It is not a business. It is a federal agency that carries out the direction of laws, regulations, policies, and the current Forest Plan. It seeks to manage the land to meet the desired condition identified for each LUD. It is directed to manage LUDs identified for timber management to produce timber in order to achieve the goals of the Forest Plan for those LUDs. It attempts to do this as efficiently as possible, but maximizing return of profits to the treasury is not the goal. Refer to Purpose and Need in Chapter 1 for additional information on the goals and objectives for the project area.

I can't help but comment on the proposed timber sale on the Chilkat Peninsula. For too long has this community acted as if commercial activities should take place elsewhere, provided those activities are taxed and the tax dollars are funneled through Juneau. Our society needs commercial and industrial activities right here, now. Perhaps the next generation will realize that our material well-being is dependent upon these commercial and industrial activities; and in order for us to have anything material someone has to go to work and do something. In this case the "something" is the proposed timber sale. So please conclude that I support harvesting timber at Couverden, as much as possible as soon as possible.

TM-1

Thank you
Tom Meyer
(907)586-1773
229-5th Street
Juneau, Ak 99801

Response to Tom Meyer

TM-1: Your support of harvesting timber at Couverden is noted.

This is my written comment about the Couverden timber sales I don't consider myself a tree hugger, in fact I have two acres of trees and I cut down four trees yesterday. I have three wooden houses, a wood fence, wood floors, I love real wood. My forest is managed like a garden removing trees so others will have more space, light etc to grow; our business is a B&B. is in the middle of all these beautiful trees and the tourist love it. So you can see why I would prefer #5 plan for Couverden. I want a viable sustainable forest. I think we should be a good example for every one in the world, to see how we have for thought in managing our forest which includes supporting wild life and viewing for the tourist.

LM-1

I used to be a commercial fisherman and witnessed a lot of abuse from logging com. that didn't care about the rules and to small of fines set fourth by the forest service. I would like to see the wood available for subsistence use permits, and local industry. We are having a hard enough time living here trying to carve out a living, now that were out of the fishery.

LM-3

Tourist have written lots of emails say they aren't going to come to AK. Because of the wolf kill. You say what does that have to do with this? I say a lot. People are saying and well organized and believe me people don't want to see clear cuts or miss managed forest. But they would be very happy as would I to learn that if we adopt #5 plan we are caring and intelligent people in AK. We care about our world and we should be doing the right thing. Why should we sell our resources at a loss? The tourist also wants to know why there are lots of roads in Couverten and bad roads in Gustavus. With plan #5 the land will be alive and well for our great grand children.

LM-4

Lynn Morrow

Response to Lynn Morrow

LM-1: Your comments on how you manage your forestland are noted.

LM-2: Your support of Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

LM-3: Small sales are included in this analysis.

LM-4: There are roads in a portion of the Couverden project area because this area is allocated to LUDs that allow timber harvest and roads are needed to manage the area for timber. These roads also provide opportunities for recreation, such as mountain biking and wildlife viewing, and provide access for subsistence hunting. We can not comment on if or why there are bad roads in Gustavus. Gustavus is not part of the National Forest.

Richard T. Myren

RECEIVED

**A CRITICISM OF U. S. FOREST SERVICE
COUVERDEN *draft* EIS OF RICHARD MYREN
March 29, 2004**

MAR 30 2004
Juneau Ranger
District

***SOME*
EFFECTS OF CLEARCUTTING
ON SALMON HABITAT
OF TWO SOUTHEAST
ALASKA STREAMS**

W.R. MEEHAN
W.A. FARR
D.M. BISHOP
J.H. PATRIC



INSTITUTE OF NORTHERN FORESTRY
PACIFIC NORTHWEST FOREST AND RANGE EXPERIMENT STATION
U.S. DEPARTMENT OF AGRICULTURE
JUNEAU, ALASKA
USDA FOREST SERVICE RESEARCH PAPER PNW-82 1969

Juneau, Alaska

Couverden Timber Sales Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

Gentlemen or Madam:

At the March 16 Couverden Timber Sale meeting of the Forest Service I was rebuffed, though, courteously, by a heavy set gentlemen dressed in the Forest Service uniform. I am sorry I did not obtain his name. Perhaps I am seen as an curmudgeon, pushing 80 years of age. I can play that part, and typical of one that has seen too much of life as well as the U. S. Forest Service, unfortunately.

A younger, slender gentlemen of the Forest Service made most of the presentation courteously but made a statement which really irritated me. He said, in effect, he could selectively determine in the present EIS process which subjects were in effect germane to the draft EIS process and which were not and hence would be considered further in the EIS analysis ! If the public responds in a serious and deliberate way every question asked certainly deserves an answer, if possible, and, I thought, required by law. It is a public resource.

I became especially concerned however following the comment one of the foresters made after I stated to the effect, " we don't know what the long term effects of logging are." I don't recall his name, but in uniform, a heavy set individual who responded that there is plenty of evidence, showing, in effect, that long term effects have not been observed. He therefore implied if such effects exist they have not been noticeably injurious to the salmon and fish resources as demonstrated

RTM-1

RTM-2

by the observations of several cases of regenerating stands of forest that had been initially cut a hundred years or so ago. They are perfectly healthy and near a size to compete the rotation cycle, he said. His inference that concern about possible adverse long term effects on fish resources was simply grossly in error.

RTM-2
cont.

There is a very serious problem with such a position simply because it is unfounded and not documented through the observations of a rare rain on snow event Drs. F. A. Davidson and S. J. Hutchinson of the U.S. Fish and Wildlife Service¹ have made at Little Port Walter, Alaska located near the southern tip of Baranof Island. When these rare incidences occur they are biological disasters. A USFW fishery laboratory had been established at LPW in 1934 to study life history of salmon. A moderate size salmon stream, Sashin Creek was the center of the project. Two major structures were constructed, a weir to block upstream adult spawners, and screens to block downstream migrants in the spring. The maturing adult migrants returning from the sea in late summer and fall were then counted and returned to spawn in the stream while the downstream migrating young newly hatched salmon fry in the spring were counted before release to enter the estuary and sea. Therefore, the complete the life cycle was monitored. The project was soon to justify its cost in the a handsome return in information.

RTM-3

... In the winter of 1941-1942 two weeks of freezing weather prevailed from the last of November to the middle of December. This was accompanied however, by heavy snowfall that completely blanketed the surface and prevented freezing to any appreciable death. Ten days of clear weather with freezing temperature at night

¹ Weather as an Index to the Future Abundance of Pink Salmon in Southeast Alaska. U.S. Fish and Wildlife Service., Little Port Walter, Alaska (undated) 16pp.

proceeded the sudden thaw on January 9. During this period the stream level dropped below normal and some freezing occurred in the exposed gravels. Frozen eggs and young were observed here and there in the exposed areas but there were no indications of a serious mortality in the brood. In fact the accumulating flood produced by the sudden thaw and heavy rains on January 7 took such a large toll of the brood that the effects due to freezing were completely obliterated.

The effects of flood waters in the stream at Little Port Walter, have been observed the year around since 1934 and no previous indications of a severe washing of the banks or scouring of the bottom have been noted. This has not been because the floods are of minor importance, for the streams is frequently subjected to freshets resulting from 6 to 8 inches of rainfall within a 12 to 24 period. In fact the average annual rainfall at Little Port Walter of 227.8 inches is greater than at any other location in southeastern Alaska thus far recorded. Therefore, the flood that followed the sudden thaw and continuous downpour beginning January 9 were more than an exception to the rule.

The melting of 4 to 7 feet of accumulated snow in the watershed together with the heavy rains produced a freshet that not only thoroughly scoured the stream bed but also moved logs along the banks that had not been dislodged for many years. The scouring was the most severe in the lower two thirds of the stream where the bottom consists mainly of fine to medium gravel and

RTM-3
cont.

where the spawning was the heaviest. Millions of developing eggs and young were washed out of the gravel and carried downstream with the current. Thousands were caught in the grass and debris along the banks but most of the tem drifted out of the stream. The bulk of the fry that later migrated to the sea came from the rocky area in the upper third of the stream that was not so seriously affected by the scouring flood. Had not the exceptionally large spawning population of 84,304 salmon entered the stream in the fall of 1941, this rocky area wold not have been heavily seeded, for the population pressure which occurs in large runs force the salmon to spawn in all the available areas in the stream regardless of the character of the bottom. The total of 1,024,364 fry were finally counted out of the stream. This was about one third of the 3,402,630 fry produced in the stream the year before from a much smaller spawning population. The escapement in 1940 being 54,594 whereas it was 34,304 in 1941. In view of the excellent seeding that resulted from the spawning in 1941 there is little doubt but that it would have produced as many fry as did the 1940 spawning had not the flood destroyed such a large part of the brood. Therefore, since the fry migration in 1942 was only 30 percent of that which occurred in 1941, the loss due to the flood must have accounted for at least 70 percent of the brood.

RTM-3
cont.

We must however pay special attention to the fact that the LPW watershed was completely pristine, un-roaded, and un-logged , with the only intrusion just above tide water at weir and counting screen location.

In short, the U.S. Forest Service is sole author of the indefensible position of making every logged watershed in the Tongass under its jurisdiction committed to logging potentially the object and recipient of a single hundred year rainstorm event that will modify the watershed and production of fish on irreversible geological levels of action and change.

RTM-3
cont.

Not like the Sashin Creek watershed which was pristine above the counting station at the mouth there are hundreds and thousands of acres of regrowth bisected by numerous roads each forming a addition drainage channel and streambed which now all over the Tongass wait for such events as a 100 year storm. Therefore, during our conversation when I said to you. "We don't know what long term effects are" it was in the context the public and perhaps several biologists which have not had access to the information and its gravidly. Well, a few, Davidson and Hutchinson, and some others, including myself, knew.

RTM-4

I had last fall a telephone conversation with the new forester Cole and although our conversation ended on a friendly note especially over the fact that he had been a fisherman and was from Petersburg--if I have my facts right. But prior to that ending, the Regional Forester did not agree with me that the fishery resources are not being properly protected because existing leave strips are not adequate and aggradation is a more serious problem than the Forest Service wishes to admit. Stream widening on larger streams after logging due to aggradation² is a fact. It may be appear suddenly after a large flood or slowly in the absence of major floods, and is only matter of time for its

RTM-5

² Hicks, B. J. , Hall, J.D., Bisson, P.A. and J. R. Sedell. In Influences of Forest and Rangeland management of Salmonid Fishes and their Habitats., W.R. Meehan editor. . *Responses of Salmonids to Habitat Changes*. U. S. Dept. Of Agriculture, , Forest Service American Fish. Soc. Sp. Publ. 19. 751pp p. 464.

effect to become visible.

Our memories are short. A few years and major storm, named after the day it occurred as the Thanks Giving Day storm, caused havoc in southeast Alaska blowing down large numbers of trees over a good portion of southeast Alaska. Perhaps this is another so-called 100 year event. And a less but intense storm occurred within the past two decades which caused several land slides in the Hollis Alaska where logging occurred. How many other cases are of these potential long term effects? These transforming events act geological time scales and are permanent with respect to our own life times..

RTM-6

In closing, I want to tell you a story about a phenomenon called over land flow. In southeast Alaska it seldom happens but like most rare events it potentially carries much potential danger and change in its wake. I worked as a fishery biologist once at Little Port Walter and in Sashin Creek an average stream for southeast Alaska as to size. One fall considerable rain fell over a period of three days and the stream reached a high flood stage. The stream was still contained by the banks but another kind of flow appeared. Looking down toward my boots I noticed a single hemlock of spruce needed slightly move, or wiggle momentarily! It was a subtle movement, and because the rain had stopped at the time and the observed motion had not been caused by a rain drop which seemed the only likely explanation for the movement. As I looked more I would occasionally observe other slight vibration like movements on the forest floor. I suddenly realized I was seeing overland flow, a relatively rare event even in Southeast Alaska rainforest. With intense high rainfall and even for LPW which has an annual rainfall of over 200 inches a year. I had to conclude there was a thin flow of surface water moving across the surface directed toward the creek. Evapotranspiration usually removes this water returning it to

RTM-7

the atmosphere and not affecting the stream.

But another remarkable fact also seemed to occur. The stream at flood stage was not a dirty gray and an indicator of soil erosion but a dark brown color, from the tannin's of decaying organic material primarily from the muskegs perhaps indicating the watershed was still intact with the plant cover protecting the soil beneath from erosion. After about three days the storm abated and the stream returned to normal with the tuberous bank vegetation flattened and organic debris deposited but no erosion, stream widening, nor aggradation, observed.

RTM-8

I don't see that future ahead is very bright for most of the streams in logged watersheds.

<<<<◇>>>>

I believe the public has been captive through the extreme prejudice within Forest Service which grew since the time timber interests and less than pure scientists separated the Forest Service from its legacy left by its major charismatic creator, Gifford Pinchot. There is not a clearer case than this as the relentless closed minded reductionism of the influences contained in the writing of such individuals as Chadwick D. Oliver and Bruce C Larson writing and authorship of *Forest Stand Dynamics* (Updated version).

These authors openly declare on pages 4-6 their commitment to reductionism and their fear in the unknown which they seem to identify with holism. Reductionism can develop a powerful and appealing argument which these two authors also realize have its enemies and for which in the highest of scientific tradition bear their reductionist position through their warnings and writings. The heritage of von Bertalanffy and systems modelers, such as F. Herbert Bormann and

RTM-9

Gene E. Likens and these author's contribution *Pattern and Process in a Forested Ecosystem: Disturbance, Development and the Steady State Based upon the Hubbard Brook Ecosystem Study*³ is in juxtaposition which gives cause to Oliver and Chadwick but also Dr. William Meehan in his momentous compendium,⁴ *Influences of Forest and Rangeland Management on Salmonid Fisheries and their Habitats* composed of 18 chapters, 751 pages, and 2,146 citations the contributions of a roster of 35 individuals, primarily fishery biologists from the western states and British Columbia well known from publishing in their fields would seem to be the sound and unimpeachable document which it is not. The document would draw the strands of studies in review articles accomplished primarily over the previous 30 years into meaningful patterns of significance though most all qualitative rather than quantitative in character for the different subjects fishery biology commonly encounters but relative to logging activity in particular it would seem. This document of reference of 2,146 publication titles is however a remarkably empty of reference to long term quantitative studies. To ignore one of the few possible disciplinary links to long term effects of logging is no better demonstration of the failure of forest science than can be found in the literature. To ban the modelers from the realm of fishery- forestry science is either a dishonest forestry science or one had better get a better brain. To legitimize that ban through the American Fisheries Society is an unspeakable injustice to fisheries science.

RTM-9
cont.

RTM-10

And there are serious other long-term problems generated from such

³ _____, © 1979. Springer-Verlag, New York, Inc.

⁴ Meehan, W.R., editor. 1991. *Influences of Forest and Rangeland Management on Salmonid Fishes and Their Habitats*. including a Chapter within the book, Swanston, D.N. 1991. Natural Processes. Am. Fish. Soc. Sp. Publ. 19: 139-179. American Fisheries Society Special Publication 19. Bethesda, Maryland. U. S. Forest Service, Pacific Northwest Research Station and Forest Environment Research, 1991. 751pp.

prejudice. These are published projections of the long term cycle such as by Bormann and Likens (1969)⁵ that can be used to satisfy and fill in good stead for the absence of the direct observations which cannot become to be developed well until active field studies are instituted from current field data to construct 100 year effects studies. But the Forest Service has clearly decided to ignore the Bormann and Likens steps in this direction. It is interesting to observe, for example, and for which the cover of this document seems to be an omen in fact demonstrates the very problem graphically. The errors in previous belief that the fishery resource was being protected as shown in the drawing because what we see in the picture are meaningless appearances which do not adversely affect the fish resource. The seeming substantive and extensive Meehan Compendium does indeed show an extensive literature, but of grossly limited to the scope of the qualitative, for which the greatest error is the lack of quantitative studies in fishery biology.

RTM-11

That the *Compendium* is a very accomplished work and backed by the American Fisheries Society which again spoke for its credentials and the excellence of the contributions. But alas, it is also the documentation as well of the near absence of quantitative studies in fisheries science cannot be repeated enough! There were very few quantitative studies of fishery biology reported. Its editor, however, from whom the cover jacket bears his name is not a fluke of nature but is also a real statement of the depth and where fisheries science has been over a significant part of history, and history that came alive with publications following the Congressional sponsored funding following passage of the National Forester Management Act of 1975. But these new funds supported little

⁵ _____, F.H. and G. E. _____, 1979. *Pattern and Process in a Forested Ecosystem: Disturbance, Development and the Steady State* Based on the Hubbard Brook Ecosystem Study. Springer Verlag, New York, London...253pp.

dedication to serious studies and commitment of long term studies, such as made possible the significant findings derived at Little Port Walter from Sashin Creek. Its significant achievement the proof that leave strips of timber were vital to the health of stream life and salmon was its singular most important accomplishment. But alas, its payback with the disbandment of the Auke Bay laboratories research in salmon life studies through moving the enterprise to Idaho, and sabotaging the scientific structure developed and in place at the Auke Bay laboratory. This move was solely achieved by one of the peoples representatives in Washington D.C.

One interesting fact if not alone and in illuminating the extreme prejudice inherent in Forest Service thought is perhaps the same and very illuminating thinking of Chadwick and Oliver's historical perspectives⁶ with its clear and admitted prejudice of Bormann and Likens (1969). The prejudice seems to be carried on through not being listed nor recognized in the Meehan Compendium among the several categories of subjects, and topics commonly known. Bomann and Likens were the two scientists's that held the important link, if not the only link, to long term studies bridging the gap in information from the short term qualitative studies that constituted well over 95 percent of the published literature on fisheries! The American people ought to be disgusted with you. From the Compendium listings of thousands of short term studies and with long term studies so very rare it questions what is fishery biology, anyway? One of the giants of fishery science Professor Robert May would comment on the cause why long term effects studies have not materialized. I am proud to be a party to one of the most significant quantitative fishery contribution ever published in

RTM-11
cont.

⁶ _____, D. O. and B.C. _____. *Forest Stand Dynamics* (Updated version), Wiley. N.Y. 520pp., 4-6.

Alaska which I have happened to be the junior author⁷ the *Caveats* paper discussed shortly.

One insurmountable error in Meehan's approach and certainly not tendentiously expressed was this: almost all the data and publications reviewed in the *Compendium* were of qualitative data mostly characterized as short term relative to cutting and regeneration of the forest in the 100 year cutting cycle! It was a fact which writer Jon R. Louma observes in the *The Hidden Forest* and appropriately subtitled *The Biography of an Ecosystem*⁸ starkly undresses and reveals the real shallow substance in Forest Service plans and studies. The absence of quantitative studies was identified and explain by British ecologist Robert M. May

RTM-11
Cont.

... In 1963... He pointed out that one analysis of 308 ecological studies showed that the average length of each bit of research was only 2.5 years. Another analysis of 746 studies published in the prestigious journal *Ecology* showed a scant 13 lasted even for five years, and fully 40 percent lasted for less than a year. In terms of geographical scale, the problem was even more striking. An analysis of 97 field experiments found that fully 44 percent covered an area of less than one square meter—about the size of a coffee table, with fully three fourths of them falling under ten square meters.”⁹

⁷ Pella, J. J. and R. T. Myren 1974. *Caveats concerning evaluation of effects of logging on salmon production in southeastern Alaska from biological information.*, Northwest Science 48: 132-144..

⁸ _____, J. R. *The Hidden Forest: The Biography of an Ecosystem* 1999. Henry Holt, pp. 228

⁹ *Ibid*, p. 10.

And Louma would further quote May,

... For a variety of reasons, ... many of our universities and other institutions do not easily accommodate work that stretches across traditional disciplinary boundaries, or that involves gathering data over a long time or a large area. For one thing, although departmental and other organizational boundaries are themselves usually the result of past evolutionary accidents, they are too often seen as absolute and inevitable; this can hinder new initiatives. For another thing, the time constraints of Ph D. theses of the funding cycles of research grants understandable militate against long-term studies.¹⁰

RTM-11
cont.

Well, the Bormann and Likens (1969) study is one of the few windows open into possible long term effects, as I have previously insisted upon and the Meehan Compendium ignore it says more than words of the quality and intent of Dr. Meehan's and his compendium. It was a window that could be opened any time. That the Meehan compendium does not cite B&L (1969) in its extensive index simply anchors into eternity the bias and prejudice which the U.S. Forest Service has constructed and fostered and has become so invasive that even the representative of American fisheries biology, the American Fisheries Society has not identified the engine within itself which has permitted such a corruption of truth.

It may also be noted that the attempts at extermination of holism appears to have come to an end by given refuge by the dean of reductionism himself, no less that E.O. Wilson though only supporting

¹⁰ *Ibid.*, p. 204.

its weak version¹¹ and is an immense step forward. Alas, Chadwick and Oliver who thought they had ridded themselves of that pest have that monkey back on their back.

The possibility of minimizing destructive increased stream flow flowing immediately following cutting can elicits from the public the criticisms of what will occur in the 30-year scheduled responses for a problem which has at least a 100 year effect. This practice has segmented the criticism into three consecutive parts each one following the other and built up on their backs of the predecessor cumulative effects which the effect will not be known until 100 years, at the least. Such effects have occurred without any way that the public can have meaningful comment upon the entire cycle until a century has passed! Isn't this creating and foisting potential unknown effects of on the future to deal with instead of meeting the challenge by those who have created it?

RTM-11
cont.

<<<<<<◇>>>>>>>

I have considered myself a scientist through I know over the years several others have not. Some of their belief was perhaps justified. I believe some of the problem is that I was raised a Christian Scientist and as a young person was a true believer. For example its teaching to me said there could be a memory in nature that would not make the roles of a perfect six sided die independent, for example and therefore face up equally one sixth probability for each side. Instead, for me, between the time to the next throw of the die divine intervention could have occurred which explained the outcome. In my awakening philosopher Benedict Spinoza (1632-1677) replaced Mary Baker Eddy, so I was still in the clutches of a almighty but less so compared to my

¹¹ _____, 2002. *The Future of Life*. Vintage Books., Random House N.Y. 229pp., p 10-12.

childhood state. But then came the day that the role of the die was supreme and all was explained by grim but liberating probability.

Now however the pendulum swung again, in fact on the morning that I had sat down to put these words on paper. I came to it in reading the Freeman J. Dyson review of "*Debunked! ESP, Telekinesis, Other Pseudoscience*"¹² presented in the book review of Charpak and Broch and I have fled my stark and extreme existence of a complete reductionist to a better world which I believe my hero Freeman Dyson has known for some time. He would write,¹³

... There are two extreme points of view concerning the role of science in human understanding. At one extreme is the reductionist view, holding that all kinds of knowledge, from physics and chemistry to psychology and philosophy and sociology and history and ethics and religion, can be reduced to science. What ever cannot be reduced to science is not knowledge. The reductionist view was forcibly expressed by Edward Wilson in his recent book *Consilience*. At the other extreme is the traditional view, that knowledge comes from many independent sources, and science is only one of them Knowledge of good and evil, knowledge of grace and beauty, knowledge of ethical and artistic values, knowledge of human nature derived from history and literature or from intimate acquaintance with family and friends, knowledge of the nature of things derived from meditation or from religion, all are sources of knowledge that stand side by side with science, parts of

RTM-11
cont.

¹² _____, G., and _____, H. _____ 2004. John Hopkins University Press., USA. 176pp.

¹³ *Ibid.*

human heritage that is older than science and perhaps more enduring. Most people hold views intermediate between the two extremes.

Dyson closes saying he is close to the traditional extreme, as compared to the Charpak and Broch reductionist extreme.

So what does this have to do with my life now. I will say this, Dyson is right, and I for example follow him to the extent that the whole of the forestry is out of step. The reductionist and silly thin leave strip of seldom over 150 feet has got to go and at least a forest around each stream must be restored or preserved so that standing in the stream one cannot see beyond the leave strip for the trees. And that is as good a science if not better than is the self serving reductionism of its opponents belief it is bad science.

RTM-11
cont.

So now it seems another turning point has been reached. Michael Dombeck, former Chief of the Forest Service would comment on such thoughts in another way and though not as directly as to its details,

... The body of knowledge about the **long-term effects** of management activities on landscape is limited, so it follows that large, undisturbed areas are important outdoor laboratories. (Emphasis added). They provide the scientific data and information base for both the biotic and physical properties of what the land once was and perhaps could be again. It makes good sense to maintain remnants of the genetic library of life and physical character of the land. Future generations will want and need this information."¹⁴.

¹⁴ _____, 2002. *No Place Distant*. Island Press. Washington, Covelo, London. 297pp., .p. xii-xiii.

Dombeck's chooses following his foreword the "Coda: Wilderness Letter," of Wallace Stegner,

... Something will have gone out of us as a people if we ever let the remaining wilderness be destroyed; if we permit the last virgin forests to be turned into comic books and plastic cigarette cases; if we drive the few remaining members of the wild species into zoos or to extinction; if we pollute the last clear air and dirty the last clean streams and push our paved roads through the last of the silence, so that never again will Americans be free in their own country from the noise, the exhausts, the stinks of human and automotive waste."¹⁵

RMT-II
cont.

In closing, I would like to say that our civilization is burning up a world in which will never return nor even approach to what it once was. There are however still some areas our father's, father's, father's knew however, and we must protect them. They will become increasingly valuable both scientifically and aesthetically. Forestry has always been in the vanguard, as evidence of the disappearances of forests all over the world. Gone from the Old World and shortly to be gone from the New World if awareness is not kindled and action taken. Tree plantations are not forests. Humanity needs wild uncultivated wastes, and wilderness also to anchor its own fast disappearing identity.

Sincerely,


Richard T. Myren

¹⁵ *Ibid.*

Response to Richard T. Myren, Institute of Northern Forestry, USDA

RTM-1: We regret that you felt rebuffed by one of the Forest Service personnel at the Juneau public meeting, but we are glad that you felt the presentation was courteous. The speaker that stated the Forest Service could decide which subjects were germane to the DEIS process was trying to explain that a comment on something beyond the scope of this EIS would not be considered substantive for this analysis. For example, comments that the Forest Service should stop managing the National Forest for timber or that it should allow timber harvest in more areas would be appropriate issues for the next Forest Plan revision. However, they are not issues that could be considered in a project EIS. These issues were decided for the current planning period in the ROD for the current Forest Plan. They are not open for consideration at this time and in this project-specific analysis.

RTM-2: As you note, there have been adverse effects of salmon from past logging. The Forest Plan contains standards and guidelines designed to prevent damage to fish habitat or to fish.

RTM-3: Thank you for the information on past studies of salmon and the 1934 flood on Sashin Creek caused by a rare rain-on-snow event.

RTM-4: As you point out, the 1934 event occurred in a pristine watershed. We agree that events of this size are likely to cause stream damage even in pristine areas and harvesting and road construction may compound these effects. We cannot control natural events nor mitigate against all adverse effects. However, as you note, these are rare events and we do not believe that it is likely that all, or even many, of the watersheds on the Forest will have an event of the 1934 Sashin Creek magnitude in the next hundred years.

RTM-5: We agree that stream widening on larger streams after logging can and does occur if streams are not adequately protected. However, we believe that the extensive buffers provided for under the Forest Plan do protect streams from significant adverse effects. Please note that the Alaska Department of Environmental Conservation concurs that this project is consistent with the Alaska Coastal Management Program for water quality.

RTM-6: Your comment about a large windstorm that caused extensible blowdown in Southeast Alaska is noted.

RTM-7: We agree that overland flow is rare in the forests of Southeast Alaska.

RTM-8: We agree that protecting stream bank vegetation is important. This is why the Forest Plan requires riparian buffers. Please refer to the Unit Cards for maps that show the proposed riparian buffers.

RTM-9: We did not rely on the works of either Oliver or Larson for this analysis. We did use three studies authored by Swanston in this EIS (as you recommend) because these articles are current and we believe that they are applicable to this analysis.

RTM-10: We do not agree that we “ignore one of the few possible disciplinary links to long-term effects of logging” and that this demonstrates the failure of forest science and that modelers are banned from the realm of fishery-forestry science. This analysis cited over 100 references from a wide range of sources, including academia and government. There is an extensive body of science literature on fisheries and forestry and on the effects of logging on fish and water quality. We cannot cite every work. Studies such as the Bormann and Likens (1969) are less current than newer studies, such as the Swanston studies, which were considered more relevant to this project.

RTM-11: Your additional comments on these studies and on the philosophers you cite, as well as on former Chief Dombeck comment on long-term effects of logging are noted.

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RECEIVED

MAR 22 2004

Juneau Ranger
District

MARCH 19 - 2004

Juneau Ranger District

8465 Old Dairy Road

Juneau, AK 99801-8041

DEAR SIR

I've been in the logging business for 45 yrs and cut timber for 40 yrs. and would like to make a few comments on the Couverden Sale. I am 100% in favor of the sale for economic reasons, and want to make a list why.

① We need to harvest our timber as alot of timber is over ripe (I've cut alot of timber here in Southeast that will run 50% ^{higher} pulp) and we need to start new forests with planting & thinning. Its a shame to let our natural resources go to waste.

② Its great for wild life as it puts lots of feed (plants, berry's of all kinds) which the deer and and bear thrive on. They will also use the road system for traveling. I do believe its a shame to tear out the culverts and bridges after the logging is done where there is no access into the forest for thinning & subsistence

(2)

hunting. If there is signs put up to travel at your own risk it should protect the state from any law suits. DN-4
cont.

(3) New forests are beautiful and will grow back pretty quick if done properly. Clear cuts are a eyesore for awhile but trees do grow back, and is a real waste to let our timber rot that's over ripe and isn't a pretty sight with all the dead tops etc. DN-5

(4) It is such a boost to our economy. Puts jobs in mills, logging jobs, a big boost to small airlines services such as wings, lab service, and list goes on & on. It doesn't matter if its logging, mining, industry of any kind, theres going to be stiff opposition from the environmentalists and other groups that have high paying jobs & don't care how the working man survives. They do not realize how beneficial logging can be if done properly. DN-6

Thanks for letting me make a few comments from an old logger of almost 50 yrs.

Sincerely
Dean Nelson
P.O. Box 565
Hoonah, AK 99829

Response to Dean Nielson

DN-1: Your support for the sale of timber is noted.

DN-2: Your comment that we need to replace the “over ripe” timber with new stands that are planted and thinned is noted.

DN-3: Refer to pages 3-42 to 3-47 of the DEIS for a discussion of the effects on deer habitat.

DN-4: New roads are proposed for closure because the roads would be built under the silvicultural exemption from Section 404 of the Clean Water Act. The Corps’ comments on the DEIS state that “the forest road exemption applies only to roads that would be used solely for normal silvicultural activities, such as the harvest of trees. Forest roads that would remain open and that would provide more than incidental use for use for subsistence or recreational access, or other public use...would not be exempt from Section 404 requirements.” Roads are also closed to reduce future maintenance on a road that may not be needed for many years. In addition, a preponderance of scoping comments favored no additional roads in the project area.

DN-5: The effects on scenery from the proposed alternatives are discussed under Issue 5, pages 3-80 to 3-104.

DN-6: The economic effects of harvesting timber are discussed under Issue 3, pages 3-60 to 3-74 in the DEIS.

I am writting this in hopes of contributing to the effect that the people of Juneau will have on the decision about the Couverdon timber sale. I am away at school right now, and would of course prefer to speak about this in Juneau, but that is not an option. I only know what I have read in the paper, and I feel that that is enough to voice my opinion. I am hoping that sooner than later, the forest service will begin to listen. Please listen to all of the scientific evidence regarding the unsustainability of clear cut logging practices and the history of damage caused by logging roads. We know that clear cuts destroy habitat. We know that sediment will run, landslides will follow, and wildlife will take the brunt of it all. We also know that Juneau is a thriving tourist attraction with an enormous amount of revenue coming out of this industry. There are several boats and planes that travel around or over Couverdon and nobody visits, "pristine Alaska" to see clear cuts. Please dont hurt this more sustainable industry. Finally, please listen to the people. According to the paper, most people attending the meetings are opposed to the sale. Isn't that what the number one duty of all government agencies is? To serve the people? I am realize that many people are more educated and more eloquently spoken than I, so I guess my hopes in writing this are to contribute to the quantity of people who adamatly oppose this sale. Thank you for listening.

ALN-1

Abby Louise Norman

Response to Abby Louise Norman

ALN-1: We do not agree that the timber harvest program on the Tongass is unsustainable. We believe that Forest Plan standards and guidelines adequately protect water quality, wildlife, fish, scenery, and other resources. Refer to Chapter 3 of the FEIS for a discussion of the effects on these resources. Also refer to the response to BHB-2.

Jenny Pursell

RECEIVED

MAR 29 2004

To: Juneau Ranger District
Re: Pt. Couverden Timber Sale

March 26, 2004

Dear Juneau Ranger District,

I believe that Alternative 1, no action, is the most prudent choice for the proposed Pt. Couverden timber sale.

Following are many significant reasons why Alternative 1 is the best choice. At this time Sitka spruce and western hemlock are more valuable left standing. The current market values of SE Alaska timber are low and as a result tax payers will subsidize costs for road building and other related timber sale activities. Other reasons that this sale should be precluded are: Alaska Natives living in Hoonah have historically and culturally used this area for subsistence, logging will threaten those activities. Pt. Couverden offers regional opportunities for hunting, fishing, and recreation. Both locals and visitors use this area for its wildlife and wilderness values. Logging will threaten those values. Pt. Couverden is enroute on the flight path leading to Gustavus, where many tourists travel, ultimately to explore Glacier Bay National Park. Swaths of clear cuts will be seen from those flights, thus negatively impacting the view shed. Pt. Couverden is a rich and diverse area for wildlife. It provides habitat for black and brown bears, wolves, moose, and deer. At higher elevations, mountain goats abound. Homeshore is a productive salmon spawning stream. Clear cutting, road building, noise, and other logging related infrastructure will disturb wildlife and compromise their habitat. Log Transfer Facilities are not good for fish. The organic debris that sloughs off of the logs sinks to the bottom of coves and bays. This debris and tannic acid which seeps out of tree bark creates an organic sludge which sucks oxygen from the water. This occurrence prohibits fish from using these coves and bays.

The afore mentioned negative impacts of logging at Pt. Couverden are the reasons that I believe Alternative 1, no action, is the only choice regarding this timber sale proposal.

Sincerely,

Jenny Pursell

Jenny Pursell
P.O.B. 33578
Juneau, Ak. 99803

JP-1
JP-2
JP-3
JP-4
JP-5
JP-6

Response to Jenny Pursell

JP-1: Your support for Alternative 1 is noted. Alternative 1 would not meet the Purpose and Need for the project, as stated in Chapter 1 of the EIS. Alternative 1 would not manage the timber resource on suitable timber lands for production of saw timber and other wood products, it would not contribute to meeting the annual market demand for Tongass National Forest timber (including the needs of the local community), provide opportunities for resource uses that contribute to the local and regional economies, or support a wide range of natural-resource employment opportunities within Southeast Alaska.

JP-2: Your comment that Sitka spruce and hemlock are more valuable left standing is noted. Timber would only be sold if prices increase to the point that a sale would be economical.

JP-3: We do not agree that the proposed harvest will threaten subsistence practices. Please refer to the Subsistence sections of the EIS for an analysis of the potential effects on these resources. Testimony at the ANILCA hearings and written comments on subsistence indicate that subsistence users are divided on this issue. Some people that use the Couverden area for subsistence favored the proposed action because they believe that additional roads and harvesting would improve subsistence hunting and access. Some people opposed it because they believe that logging and roading would harm subsistence resources.

JP-4: It is correct that harvested units will be visible by people flying over the area on their way to Gustavus and Glacier National Park. Based on Forest plan direction, effects on scenery are analyzed from key viewing areas. A description of these areas and the effects on scenery as viewed from these areas is included in Chapter 3, Issue 5: Scenery. These key viewing points do not include the air above the project area. Refer to page 3-196 of the FEIS to the Forest Plan for a discussion of why airplane routes are not considered in the scenery analysis.

JP-5: Wildlife species that inhabit the project area are discussed under Chapter 3, Issue 2, Wildlife in the FEIS. Please refer to this section and to the unit cards for mitigation measures included to reduce disturbance to wildlife.

JP-6: The DEIS states on pages 3-137 and 138 that bark accumulation is a potential effect from transporting logs but one that would be avoided in this project by loading logs directly on to barges. The discussion states that only a negligible amount of wood or bark would enter the water and that if minor amounts of bark do fall into the water the current would quickly disburse it. Please note that the LTF for Couverden is not located in a cove or bay. It is located along Icy Strait, which has a strong current.

Written Comment Sheet

Public Meeting for the Couverden Timber Sales DEIS

Peggy Redford

Thank you for your input.

RECEIVED
MAR 22 2004

Date: 3/19/04

PLEASE PRINT:

Juneau Ranger District

I am submitting my written statement for the record in support of AIT-#5 proposal re: the Couverden Timber Sale. It makes sense to log that area in a sustainable fashion. Consideration of low cost of lumber. There is a fair amount of local (Gustavus) construction going on. I'm sure the builders, & home owners would prefer to pay a cheaper price for "local" wood. I support the idea of selectively harvesting trees vs. clear cutting. Clear cutting destroys our forests in all ways. Old growth takes hundreds of years to return. We have several gentlemen in Gustavus, who are timber men as well as sawyers. They would responsibly harvest the Couverden area timber. This would support Gustavus economically & perhaps create more jobs & a local revenue. Thank you listening to my comments -

sustainably

sincerely,

NAME:	Peggy Redford
ORGANIZATION:	
E-MAIL ADDRESS:	
MAILING ADDRESS/CITY/STATE/ZIP:	P.O. Box 244 Gustavus, AK 99826

Names and addresses will be added to the mailing list for the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

Comments may be mailed to:

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

Response to Peggy Redford

PR-1: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

The following are my comments on the Couverden Timber Sale.

The sale is a waste of taxpayer's money and is at best and irresponsible management of our resources.

The Couverden area has scenic values, cultural resources, and recreational uses. The sale needlessly threatens all of these for short-term extraction and profit.

JR-1

The timber should be exported from the Tongass as round logs. The FS must demand that SE Alaska gain value-added processing and jobs from timber harvests.

JR-2

I support the Citizen's Alternative which seeks smaller annual harvests, without clearcutting, which will provide a greater benefit to the local community.

JR-3

Jim Rehfeldt,
Juneau

Response to Jim Rehfeldt

JR-1: We agree that the Couverden area has scenic values, cultural resources, and recreational uses. These factors are discussed in Chapter 3 of the EIS.

JR-2: Your comments on exporting wood and value-added processing are noted. Generally, spruce and hemlock logs from the Tongass National Forest are not exported in the round.

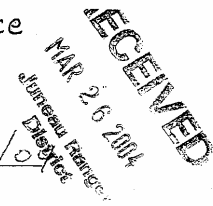
JR-3: Your support of Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

Written Comment Sheet
Public Meeting for the Couverden Timber Sales DEIS

Charlie Rice

Thank you for your input.

Date: 3/25/04



PLEASE PRINT:

THIS COUNTRY IS IN RECORD DEFICIT AND THE	CR-1
FS WANTS TO PUSH ANOTHER boondoggle	
SUBSIDIZED CLEAR CUT (PREFERRED ALTERNATIVE #3)	
IN OPPOSITION TO LOGIC AND THE AFFECTED CITIZENRY	
THE ONLY THING THAT COULD MAKE OUR TIMBER VIABLE	
IN A WORLD MARKET IS AN INTERNATIONAL MINIMUM	CR-2
WAGE - WE CANT COMPETE AND WE DONT WANT TO	
WE DO SUPPORT ALTERNATIVE # FIVE, SELECTIVE	CR-3
HARVEST AND NO NEW ROADS.	
OUR ECONOMY IS FROM TOURISM & FISHING.	CR-4
NO MORE INCREMENTAL WASTE.	
THE WORD SUSTAINABLE DOES NOT APPEAR ANYWHERE	CR-5
IN THE DRAFT EIS. WHAT EXACTLY IS A	
ENVIRONMENTAL IMPACT SURVEY WITHOUT THIS	
VITAL INCLUSION?	
AGAIN, WE SUPPORT A MORATORIUM ON ALL	
NEW ROADING & CLEAR CUTS IN THE TONGASS	
NATIONAL FOREST - MANAGE EXISTING ACCESSABLE	

Continue on back for more space

OVER

NAME: CHARLIE RICE
ORGANIZATION: NONE
E-MAIL ADDRESS:
MAILING ADDRESS/CITY/STATE/ZIP: GUSTAVUS, ALASKA 99826

Names and addresses will be added to the mailing list for the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

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Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

Timber, thin and culture of fast clear cuts.
Show us a viable second cutting so we
can begin to define what is sustainable.
We already know what's not sustainable.

On page 3-69 of the Couverton Draft EIS
it states; "The sale would only occur if
timber values rise to a level that would
result in a positive bid." (one cent is OK)

CR-6

Since NAFTA we have been in constant
battle with other countries over their
tariffs and subsidies. A honest "positive" bid
would include;

- A. NET COST OF PREVIOUS ROADING.
- B. COST OF ALL NEW ROADING & MAINTENANCE.
- C. ALL ADMINISTRATIVE COSTS & LITIGATION EXPENSES.
- D. STUMPAGE FEES PAID TO THE STATE.

We could gain some CREDIBILITY if we took our
OWN deception & hypocrisy out of our NAFTA policy.

CR-7

LET'S TRY TO KEEP THE JOBS THAT CAN'T
BE EXPORTED FROM DESTRUCTION - TOURISM, FISHING
AND SUSTAINABLE VALUE ADDED USE OF
RENEWABLE RESOURCES.

THE TIME IS OVERDUE TO DECENTRALIZE MANAGEMENT OF PUBLIC
LANDS. ANCIENTRAIN FORESTS IN PARTICULAR CAN NOT REGENERATE
IN FOUR-YEAR POLITICAL CYCLES.

CR-8

THIS AIN'T TEXAS AND WE DON'T NEED TREELESS FORESTS.

WITHOUT SOME STATUTORY AUTONOMY FROM INEVITABLE
FICKLE POLITICAL IDEOLOGYS, THE FOREST SERVICE WILL
REMAIN DYSFUNCTIONAL.

A wood worker

Charlie Rice

Response to Charlie Rice

CR-1: The issue of federal deficit and the effect of subsidized logging on this deficit are beyond the scope of this analysis.

CR-2: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

CR-3: We agree that tourism and fishing are important components of the local economy. These effects on these economic factors are discussed in Chapter 3, Issue 3: Timber Sale Economics.

CR-4: The Timber Resource Report includes an analysis of even-flow, long-term sustained yield for the project area. It includes previous and proposed harvest. The analysis concludes that a sustainable harvest of 9 percent of the suitable volume per decade is sustainable. The base year was 1979; the year the first harvest occurred. Approximately 342 MMBF existed prior to harvest on land currently considered suitable. Approximately 46.2 MMBF has been harvested from these suitable areas. This is less than 9 percent per decade. Alternative 2 has the highest proposed harvest volume, 27.4 MMBF. This is less than 9 percent. The analysis assumes a 100-year rotation for the Timber Management LUD and a 170-year rotation for the Scenic Viewshed LUD. This analysis did not include thinning volume that may be harvested from second growth stands in the future. This information has been added to the FEIS.

CR-5: Establishing a moratorium on all new roading and clearcuts on the Tongass is beyond the scope of this analysis.

CR-6: Timber values would need to rise to the point that the sale price would cover base rates before a sale is sold.

CR-7: The country's NAFTA policies are beyond the scope of this analysis.

CR-8: Decentralizing management of public lands and giving statutory autonomy for the Forest Service from political ideologies are beyond the scope of this analysis.

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Dear Juneau Ranger District

I was sick and unable to make the Gustavus public hearing regarding the upcoming Coverden Timber sales. It is disturbing to find out that there will no longer be public hearings, which brings to question, who is behind this?

Is it now the policy of the us forest service to issue unabated access to the tongass national forest to timber companies that have proven, through their past track records, that the minuscule fines they receive for cutting near streams and in area's off limits, can easily be paid from the sell of the extra timber they harvest from those areas.

PCR-1

We need a sustainable forest that takes in consideration, all the people who make use of it. As a B and B owner in very small Gustavus, we have been hit hard by environmental boycotts from groups apposed to Alaska's policies on the environment, and the slaughter of wolves in aerial hunts.

PCR-2

instead of the normal bookings we receive this time of year, we are not receiving hate mail from environmental groups that consider Alaska to be truly the last frontier.

These groups are now joining in boycott of all Alaska tourism based business, as if, it is us who is doing the damage to the environment.

No more should our forest be exploited by timber companies so Japan can have lumber. The us forest service has a responsibility to the people and businesses of Alaska to preserve these forest for our children.

PCR-3

There is no doubt we all are consumers of timber. we build our homes from timber. But the practices of low stumpage fees, the slapping of the hands of the timber companies that violate the rules and regulations also has to stop.

PCR-4

these companies should be made to pay severe penalties for violations. Here we are again, finding ourselves having to choose the lesser of evils when it comes to our choices as to what will happen to our forest.

I choose plan # 5 for Coverden, which was submitted by Greg Strevler of Gustavus. It provides a sustainable option to the horrible clear cutting practices that have been allowed by the forest service in the past.

PCR-5

Please consider the natural value of the forest for tourism and recreation. Our guest come here from all over the world to see wild Alaska, Not a clear-cut and raped environment.

Thank You Philip C Riddle, owner Bear's Nest B and B

Response to Philip C. Riddle

PCR-1: No, it is not the policy of the Forest Service to issue unabated access to the Tongass National Forest to timber companies that have cut timber illegally or to any other companies. The harvest of timber is permitted under contract for specific areas and harvest prescriptions (approved under NEPA). Qualified timber contract administrators regularly inspect harvest operations. Timber companies found to have cut trees that they have not purchased can be fined triple the value of the wood cut.

PCR-2: The State of Alaska's environmental policies and its policy on the aerial hunting of wolves are outside the jurisdiction of the Forest Service.

PCR-3: The purpose and need for this project does not include providing Japan with lumber; however, once the wood is processed into wood products, these products may be purchased by the people in America or in other countries.

PCR-4: Refer to our response to PRC-1.

PRC-5: Your support of Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

Hello,

I am a 30 resident of Alaska and 18 years resident of Gustavus, near the Couverden area. I strongly support alternative 5, which allows a low level, sustainable cut to be made available. This is the only alternative that will actually benefit local area residents, help to develop our value added wood products economy and still allow for high quality recreational use of the area. In addition it preserves the viewshed and wildlife habitat of the area.

HR-1

The No Action Alternative is my only other choice. It is clear that Tongass timber is not economically viable to cut at this time and we certainly don't need to be exporting our logs.

HR-2

I am deeply concerned about the change in policy regarding public hearings. This is our forest, taxpayers bear the brunt of paying for uneconomic timber sales, which often amount to giving it away.

HR-3

Please support the local Alternative #5.

Heidi Robichaud
Box 116
Gustavus, AK 99826
907-697-2474

Response to Heidi Robichaud

HR-1: Your support of Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

HR-2: Your support of Alternative 1 is also noted. Alternative 1 would not meet the Purpose and Need for the project, as stated in Chapter 1 of the EIS. Alternative 1 would not manage the timber resource on suitable timber lands for production of saw timber and other wood products, it would not contribute to meeting the annual market demand for Tongass National Forest timber (including the needs of the local community), provide opportunities for resource uses that contribute to the local and regional economies, or support a wide range of natural-resource employment opportunities within Southeast Alaska.

HR-3: The Forest has not changed its public involvement process for timber sale EISs. Holding formal hearings has not been a requirement. Public meetings can follow, and have followed, various formats. For example, informal information workshops were held for the Madan and Skipping Cow EISs several years ago to allow members of the public to ask specific questions and gather general information about the projects. Formal hearings were held in Hoonah and Gustavus for subsistence issues, as required under ANILCA.



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March 28th, 2004

Couverden Timber Sale Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau Ak 99801-8041

RECEIVED

MAR 29 2004

Juneau Ranger
District

Sir or Madam:

These comments are a collaborative effort on behalf of the Juneau Group of the Sierra Club (JGSC), The Sitka Conservation Society (SCS), and The Center For Biological Diversity (CBD).

The Sierra Club is a volunteer led national grassroots conservation organization with a membership of over 750,000 individuals. The Sierra Club has a history of interest in S.E. Alaskan conservation issues that dates from the late 19th century to the present. In Southeast Alaska the Sierra Club is represented by the Juneau Group of the Sierra Club (JGSC). JGSC has members who reside in nearly every community of Southeast Alaska and who derive enjoyment and benefits from the Tongass National Forest.

The Sitka Conservation Society (SCS) was formed in 1967, and has since been continuously involved in protecting SE Alaska natural resources through conservation of wildlife, fisheries, water quality, wild habitat, and wilderness and through the maintenance of subsistence and recreation opportunities. SCS is a membership organization with an activist board of 12 persons and a staff of four. Over several decades SCS has participated in the Tongass Land Management Plan (TLMP) revision process and in the decision making process for many Tongass timber projects. SCS has also fought to identify and protect species threatened by extinction, and has participated in litigation to list the Queen Charlotte Goshawk as an endangered species.

The Center For Biological Diversity works to protect wild places and their inhabitants. We believe that the health and vigor of human societies and the integrity and wildness of the natural environment are closely linked. CBD is the nations leading advocate for the protection of endangered species and biological integrity. We have been actively involved in protecting Alaska's wildlife since the early 1990's and specifically involved since 1994 when we filed a petition to protect the Queen Charlotte Goshawk under the Endangered Species Act. The CBD is still involved in active litigation over the fate of the goshawk and

SC-1

carefully follows the fate of many other species that depend upon Tongass wildlands.

Economics

The Couverden Timber Sale Draft Environmental Impact Statement (DEIS) fails to adequately disclose the full costs to the public from this sale, uses an outdated Market Demand Model, relies on a faulty interpretation of this model in its Market Demand Analysis, uses outdated information in its discussions, and provides an inadequate and misleading Financial Efficiency Analysis.

SC-2

Public Investment

- The DEIS's Public Investment Analysis uses a Forest Service Region 10 average budget allocation figure as its sole means of revealing Forest Service costs in preparing and administering the Couverden Timber Sale Project. This figure amounts to \$50.50/CCF. While large, it likely underestimates the cost for this sale as the figure is not specific for sales involving the Tongass National Forest, sales that involve road construction, and sales that have the extensive monitoring requirements that are revealed by the unit cards. Nor does the figure represent the actual amount being spent on the timber program (per CCF) during recent years, but only what is allocated in the budget. Annual Monitoring Reports reveal much more precise information from which the Forest Service could easily calculate and disclose an accurate cost per CCF of the Tongass Timber Program. For example, according to these reports, in FY 2001 the Forest Service spent \$21,192,221 on "timber management", \$13 million on "roads", and more than \$2 million on "ecosystem planning, inventorying, and monitoring". In FY 2002 they spent \$17,923,470 on "timber management", \$15 million on "roads", and \$3 million plus on "ecosystem planning, inventorying, and monitoring". These annual monitoring reports also reveal the actual amount of timber receipts that are returned to the Treasury in these calendar years.

SC-3

- The DEIS does not even contrast the \$50.50/CCF cost they do use, with the likely return to the Treasury that would result from this sale. In FY 2003 the Forest Service offered well over 100 million board feet of timber at base rates for the biddable species. For the two species involved in the Couverden Sale, Hemlock and Sitka Spruce, these rates are \$1.00/CCF and \$6.00/CCF respectively. As Hemlock is approximately 70% of the volume under all alternatives, the deficit to the public, even if market conditions improved to where an operator could reasonably expect to make a profit at base rates, would be huge. This information needs to be revealed.

SC-4

- While the DEIS notes that the most financially efficient sales for small operators take place on the road system the Forest Service fails to discuss small sales from a public investment standpoint. The following points are in regard to this issue.

- 1) In CY 2003 several small sales on the road system received multiple bids and/or large percentage bid premiums. Some examples of this include Stromboli-

SC-5

six bids with a 866% premium, Election Special-two bids with a 189% premium, Lucky Duck-six bids with a 766% premium, and Stone Re-Offer-only one bid but with a 518% premium. In contrast large sales received one or two bids and had little or no premium on the biddable species. In other words the demand was high for small sales and the return to the treasury was greater per CCF for small sales.

2) Small roaded area sales have less public investment costs also. They typically require less analysis, (EAs or CEs, rather than EISs), less monitoring, less administration, and less engineering support. The DEIS fails to note that an exclusively small sale Couverden Timber Sale Project, as opposed to just having 2 alternatives in the context of a large volume project, could have hugely reduced the taxpayer cost for a project in the Couverden area.

3) Small sales provide for local jobs rather than having a large percentage of the jobs go to outside workers.

4) The February 2004 issue of the State of Alaska Department of Labor and Workforce Development's monthly magazine, "Alaska Economic Trends", reports that 30% of the workers employed in the Lumber and Wood Products Industry in 2002 were non-residents. The commenters request that this issue be discussed and addressed, particularly in regards to the comparison of large sales to small sales.

SC-5
cont.

Market Demand

- The Forest Service has misinterpreted the Brooks and Haynes report "Timber Products Output and Timber Harvests in Alaska: Projections for FY 1997-10" (Brooks and Haynes; PNW-GTR-409, September, 1997). The Forest Service took a projection that was for both sawlogs and utility and applied it to sawlogs only. This led to the setting aside of more Timber Development LUDs in the Forest Plan than was necessary, many of them, such as Couverden, in high community use areas and possessing low market value. Subsequent demand projections such as the 2000 report entitled "evaluating the demand for Tongass timber: Using Adaptive Management to Implement Sec. 101 of the 1990 Tongass Timber reform Act", use the flawed Brook and Haynes 1997 projections as an integral part of their model's formula.

SC-6

- The DEIS misuses the Brooks and Haynes projections, and the subsequent models that tier to it, in Appendix A and elsewhere, when the F.S. claims the Tongass National Forest must offer 151mmmbf annually to meet market demand (page A-7). They are in essence using the high market scenario as a floor when low market conditions, based on sales, have been prevalent for several years and are likely to continue into the foreseeable future. The sold and/or released numbers for 1998 through 2002 are, 98/24mmmbf, 99/61mmmbf, 00/170mmmbf, 01/50mmmbf, 02/24mmmbf. The 00/170 number reflects the 100mmmbf settlement of the KPC contract cancellation litigation that went to Gateway Corporation, now bankrupt and defunct.

SC-7

- The Forest Service's models for estimating Market Demand, as noted above, are outdated and based on an erroneous assumption on the part of the Forest Service in regards to TLUMP's 10 year projections of demand. The

numbers provided by the commenters in the above paragraph provides emphasis to the now obvious need to revise and update all demand projections and base them on current market realities. The following paragraph will provide more emphasis on this point.

- Contrary to the DEIS discussion of the cyclic nature of timber prices, DEIS page 3-69, there is no reason to expect that market conditions will improve in the foreseeable future. According to the State of Alaska's December 2003 "Alaska Economic Trends" reports, 1) the Tongass is a high cost producer in a tough international market where other areas of the world such as China, Russia, Brazil, and other areas of the United States can and will continue to out compete the Tongass. 2) The Alaska Timber Industry is facing a long-term downturn due to low demand and an international glut of timber. 3) The Japanese are buying wood from other markets. 4) A global Market has developed for plantation trees. 4) The wood products industry has consolidated into corporations which avoid high cost areas like Alaska.

Outdated Information

- Appendix A and the Economic Analysis sections of the DEIS use out of date information. Some examples of this follow.

1. Table A-3. The only timber volume currently remanded is the Emerald Bay Sale. There is no volume under injunction. The commenters would like to know where this figure comes from.

2. The DEIS does not take into account the returned volume from cancelled contracts. This volume adds to the pool of NEPA cleared volume, particularly the glut of un-economic volume the Tongass is building up in Southern S.E. Alaska. This information needs to be as current as possible because it goes to the heart of the purpose and need for this sale as outlined in Appendix A under the sections "How Does This Project Fit into the Tongass Timber Program?" and "Why Can't This Project Occur Somewhere Else?" The Couverden Timber Project would only add to the glut of "on the shelf" un-economic timber, and thereby is an even more un-necessary waste of taxpayer dollars than is usual under the Tongass Timber Program.

3. The DEIS's figures for employment in the wood products industry are out of date. Page 3-62 gives a figure of 782 jobs in 2001, the latest figure the Forest Service apparently can provide. For your information the number for 2002 was 450 and the 2003 number is even less. The entire DEIS must use and provide current information when it is available.

Financial Efficiency

- The DEIS states on Page 3-67 that "utility logs are not currently required to be removed during harvest operations." The following CY 2003 sales were advertised without exceptions for required removal at fixed rates. Lucky Duck, Deadwood 5 Salvage, Twin Bridges II, South Lindy Mountain Re-Sale, Orion

South, Luck Lake, Stone Re-Offer, Lucky Logger, Situk Blowdown, and the Fusion sale.

- In 2002 the following sales were advertised without exceptions for required removal at fixed rates. Hot Springs, Summore Change, Midway Re-Offer, Pepper, and the Twin Bridges sale.

- There is no evidence in the DEIS that other costs that effect the financial efficiency of the sale have been accounted for in the logging cost estimate. The primary example of this is the Knudson-Vandenburg (KV) Deposit the Forest Service is required to collect. One example of these deposits and how large they can be is the 2003 offering of the Fusion Sale. In this case the deposit is estimated to be approximately \$150,000.00. Additionally the commenters note that if utility removal were to be optional, if or when the sale or sales resulting from the Couverden Timber Sale Project are offered, then the conditions that the KV deposit is based on would also change, and the deposit may have to be adjusted upwards. The commenters request an explanation of how, or if, the KV costs estimates fit into the financial efficiency analysis, and if they have been estimated specifically for the Couverden Sale alternatives.

- The DEIS's Financial Efficiency section lacks an adequate explanation of the terminology that is used. The National Forest Management Act (NFMA) requires that the timber cut from National Forest Lands must be sold at "Fair Market Value" *and also*, that it be sold for not less then "Appraised Value." The DEIS seems to use these terms interchangeably, making no distinction between them. It also seems to equate "Fair Market Value" with estimated "Stumpage Values". This section is confusing to reviewers. The DEIS correctly notes that the requirement to sell timber for fair market value "have been imposed to help ensure that the government is justly compensated for the timber it sells" (page 3-67). The commenters request on the behalf of all the reviewers and the interested public, an explanation of how "Fair Market Value" is calculated, how it differs from "Appraised Value", and how a sale that under any market conditions will cost the taxpayers millions of dollars to design and implement, fulfills the regulations under which the Forest service operates.

- It is apparent from the fact that the large Tongass sales are only receiving one or two bids, and always from the same 3 firms, that a non-competitive market condition exists on the Tongass National Forest. Examples of this from CY 2003 are the Fusion, Orion South, and Twin Bridges sales. Forest Service Regulations require that the existence of non-competitive markets be reported, and that special measures be implemented in regard to sale offerings when this condition exists (FSH 2422.3 and FSH 2432.04b). Has a Non-Competitive Market Condition been determined to exist on the Tongass? What measures have been taken to insure the public is not taken advantage of when their timber resources are sold on the Tongass? Has an appraisal process been designed that can best achieve selling timber at Fair Market Value (FSH 2409.18)? The commenters request that this information be disclosed in this and all other large timber sale NEPA processes.

SC-11
cont.

SC-12

SC-13

SC-14

Wildlife

- Habitat carrying capacity for critical Management Indicator Species will have been pushed to their very limits in the Couverden Project Area from past and proposed timber cutting and road building. Road density for wolf is at the maximum. Carrying capacity for deer has been reduced to nearly the minimum required for maintaining human and wolf consumptive use.

SC-15

- In every case the Preferred Alternative receives the worst ranking for impacts on species and habitat of all the claimed non-roadless area alternatives. These rankings include those for HV-POG, Coarse Canopy Habitat, Patch Size, Interior Habitat, Martin Habitat (both suitable and high value), Road Density for Martin, and Road Density for Wolf.

SC-16

- With the publication of a Temporary Roadless Rule that excludes the Tongass there is the increased possibility that the absolutely worst Alternative will be selected now or sometime in the future (Alt. 2). (See Roadless Issues section of these comments.)

SC-17

- The majority of scientists that helped to develop and review the Vi-Pop strategy of TLUMP concluded that the strategy was not adequate for protecting old growth dependent species. Their recommendations for protecting the remaining large blocks of old growth were ignored, as were their recommendations to avoid any more logging of high volume stands.

SC-18

- The DEIS repeatedly tiers to the Forest Plan, citing its conservation strategy of connected reserves as being adequate to protect old growth dependent species regardless of continued logging in the Timber Development LUDs. As noted above this strategy is inadequate.

SC-19

- The DEIS notes that the important Beach Fringe Habitat is 56% privately owned but claims there are no "Reasonably Foreseeable" developments on Private lands in the Project Area. They note that there are Huna Totem Corporation over selected lands in the area but fail to note that these lands may ultimately be conveyed and that the lands include much more of the Beach Fringe in the Project Area. The DEIS does not reveal the characteristics of the lands in private ownership. The commenters assert the Forest Service is in error when it fails to take a conservative approach and assume that development of the lands in private ownership is not only reasonably foreseeable, but given the past history of the land management practices of the actual and potential owners, nearly assured.

SC-20

- The previous points are inter-related and demonstrate that the DEIS is in error when it claims that it has adequately demonstrated that there would be no significant impacts to wildlife from the Couverden Timber Sale Project.

SC-21

Bears

- We support the use of the 500' riparian foraging corridors, and believe it should be applied everywhere along the riparian buffer. The roadless area between roads is likely to serve as a corridor for bears to move up into the more spacious northern portion of the Couverden Roadless Area. Units encroaching upon this corridor decrease its capacity as a habitat reserve and travel linkage.

SC-22

- The failure of the 1997 TLMP to protect travel corridors was an appeal issue, and severely criticized by the peer reviewers of TLMP (Powell et al, 1997). The project cannot tier to a flawed TLMP on this issue; but must correct it at the project level by protecting identified travel corridors. Past harvest and road building have already restricted wildlife corridors, especially in the Homeshore watershed (p.3-57). The F.S. cannot harvest in these units without further impact to travel corridors.

SC-23

- Units HS5, S46 have the most coarse canopy old growth structure, and units HS7 and HS26 also contain coarse canopy (p.3-25). No further coarse canopy should be harvested, as recommended by the TLMP peer reviewers (Powell et al, 1997).

SC-24

Unit by Unit Bear & Other Wildlife Concerns

- Unit HS5. The unit contains high-volume high-structure habitat for deer and marten, and is adjacent to critical brown bear foraging buffer. There are documented travel corridors throughout unit (p. B-11). Obviously bears rely on this unit as part of their feeding patterns. It should be maintained intact to protect their corridors. It is no good to protect the foraging area if you haven't protected the access to the feeding zone.

SC-25

- Unit H12. "The west half of the unit contains medium deer winter habitat and high-value marten habitat. Previous clearcuts to the north and east may have impacted dispersal/travel corridors between alpine and beach fringe." (p. B-59). The partial retention methods used for logging in this unit may preserve some habitat, but the logging disturbance is likely to drive wildlife from this area; with no alternative choices for movement because of the past adjacent logging.

SC-26

- Unit H15. "The unit contains high value deer winter habitat and high-value marten habitat. Previous clearcuts adjacent to unit may have impacted wildlife movements in this area" (p. B-71)

SC-27

- Unit H25 "Wildlife travel corridors were document in the western portion of the unit" (B-116).

SC-28

- Unit H29 "Black bear was visually observed in unit. Class III streams frame this unit". (B-145) The unit is designed for maximum modification.

SC-29

- Unit S36. Wildlife travel corridors documented in northwest corner of unit." (B-167)

SC-30

- Mitigation measures proposed by the F.S. are speculative. Bears are very sensitive to disturbance. If they do not avoid the human activity, they may become habituated to humans as the source for food. The economic contribution these bears make through wildlife viewing is greater than the value of the timber that will be harvested.

SC-31

Roadless Issues

- The DEIS untruthfully portrays the project area relative to roadless status. The document attempts to draw a distinction between inventoried roadless areas and "unroaded areas," which are un-inventoried. It states that of the 58 acres

SC-32

affected by roadless entry in Alternative 2, only 19 would have been subject to the roadless rule, because a portion of the roadless area was scored in 1995 as having NEPA cleared units, and therefore was not included in the inventory.

- The 2001 Roadless Rule did not rely on a static roadless inventory
(See the following excerpt from the Federal Register Announcement)
[Federal Register: January 12, 2001 (Volume 66, Number 9)] [Rules and Regulations]

[Page 3243-3273] Sec. 294.11 Definitions.

The following terms and definitions apply to this subpart:

Inventoried roadless areas. Areas identified in a set of inventoried roadless area maps, contained in Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Volume 2, dated November 2000, which are held at the National headquarters office of the Forest Service, or **any subsequent update or revision of those maps.** (Emphasis added)

- Since the Roadless EIS, the public has raised the issue that certain areas of great community and public value were not scored as roadless under the original inventory. SCS has corresponded with the Washington, DC office on this issue; as has Earthjustice. It was an issue in the draft comments on the Otter Lake Timber Sale. Our position is that the failure to include these areas was a mapping area; because the Forest Service did not take into consideration all information contained in the map codes, and knew that these areas remained roadless. Furthermore, the inventories done for the Wilderness SEIS were more complete, and have now replaced the 1995 roadless inventory, as provided for in the Federal Register description above.

- The Forest Service should treat all impacts on roadless areas equally, and consider them to be subject to the roadless rule. The fact that the Tongass has a temporary exclusion from the roadless rule does not negate the scientific justifications for protecting roadless areas in the Tongass, as recommended by the 1997 Tongass Land Management Plan peer reviewers (Powell et al, 1997)

- The commenters are extremely skeptical that when the final ROD is issued, or even at a later date, that Alternative 2 will not be selected. We note that a new ROD was issued for the Woodpecker EIS that raised the volume and incorporated roadless area units after another ROD had already been NEPA cleared. This new ROD is now the subject of litigation, unlike the previous one. This has resulted in an added taxpayer burden from the project.

- The DEIS does not reveal that the scenario set out in the previous paragraph is a potential outcome of the Couverden Timber Sale Project.

Riparian & Watershed Issues

- We are especially concerned about impacts to headwaters streams, which influence water quality throughout the rest of the watershed. Any human disturbance in the area is likely to lead to some level of impact to the watershed, especially in an area with so much wetlands, steep slopes, and past human disturbance. Recent research has shown that disturbances in uplands far further

SC-32
cont.

SC-33

SC-34

than the width of the riparian buffer can impact streams ((Ilhardt et al, 2000). NEPA obligates the Forest Service to use the best available science.

- Given the current depressed market for Tongass wood products, the value of the forest left standing is much higher than the timber commodity value.

- Riparian zones in Southeast Alaska, due to our high rainfall levels that create upslope fens, bogs, and forested wetlands, can stretch great distances upslope from streams. (Ilhardt et al, 2000).

"As the headwater streams go, so goes the rest of the watershed network" was the theme of a Fisheries Conference held in Juneau in 1987. (AFS, Benda, 1997). Headwater stream systems control the release of sediment to the rest of the stream system. Thus, selective harvest of larger trees can affect headwater functioning.

- Current models do not account for the stochastic nature of headwater streams, nor is current knowledge adequate to characterize or predict these streams or the total consequences of management actions around them (AFS, Benda, 1997). Headwater streams are vital sources of energy for anadromous salmonid streams in S.E. Alaska (AFS, Wilpfli, 1997). The Wilpfli studies showed that alternative to clearcutting (ATC) methods would be much more likely to protect stream functions than clearcutting; and that productivity is very sensitive to timber management.

- Headwaters streams are vitally important to the health of the entire watershed network. Their role in controlling and regulating sediment, large woody debris (LWD) influx, and food for lower drainages has previously not been recognized. Headwater streams would have received more protection under PacFish than they did under the 1997 Tongass Land Management Plan. Those additional levels of protection should be carefully considered for the Couverden EIS. Because the Forest Plan fails to be responsive to the latest science, and implement adequate protective standards, the Project cannot tier to the plan, but must impose necessary protections at the Project level.

- For the Couverden timber sale; the F.S. is proposing, under alternative 3, the proposed action, the forest service would arrive at a cumulative total of 7 road crossings over Class 1 streams, 9 over class 2, 42 over class 3 streams, and 36 over Class 4. These numbers are similar for all alternatives. About 400 wetland acres would be affected, according to the Forest Service minimalist calculations.

Unit by Unit Water Quality Concerns:

Logging systems for most units are described as needing tail holds in the stream buffers. This means potential damage to the riparian area, disturbing and damaging the under-story, and potentially the stream banks. Reading through the unit descriptions illustrates how complex the hydrologic systems of this area are, and the difficulty of locating units in a way that can guarantee there will not be resource damage.

- Unit HS5 has a Class III/4 stream to its north, between the proposed unit and a previously harvested unit (p. B-11) This stream borders the road before becoming a Class 1 tributary to Homeshore Creek, an important bear foraging area. Logging activity in the unit, and logging traffic on the road run a high risk of

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SC-35

SC-36

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SC-38

SC-39

losing sediment into the roadside ditch, and degrading water quality for this stream. Already 3 landslides have occurred near the unit, one in this stream channel. The area has already shown it is vulnerable to disturbance and it should not be disturbed again.

- Unit HS10 has a Class III channel which “could be affected by harvest” (p. B-41). There is a wetland east of the unit. (p. B-41)

- Unit H11, in which the crew is having trouble finding sufficient volume to be worth harvesting, has steep slopes, blowdown concerns, visibility concerns, and includes “4 streams and several non-streams” (whatever those are) draining the units (p. B-49). It will be very difficult to harvest this area without impacting water quality. Clearly, the resource damage done by harvesting this unit will have greater economic impact than the value of the harvested trees.

- Unit H14 has a Class III stream bordering it that already has “signs of sliding on the north channel.” There are windthrow concerns. (p. B-65) Mitigation will be difficult to guarantee under these circumstances.

- Unit H15. Resource values are very high in this unit for fisheries and for bear. There are two landslides within 0.5 miles of the unit, there are steep slopes above the Class I stream below the south side of the unit. The east boundary may have potential for windthrow after harvest (p. B-71).

- Unit H16. “An area with steep slopes is present along the southern portion of the unit, 500 feet upslope from the stream”. “This area may be unstable and a source of sediment entering the stream if this area is disturbed”. (p. B-77)

- Unit H18 has similar concerns with steep slopes. (p. B-97)

- Unit H19. “There are two landslides to the west. The proposed temporary road runs along the same slope as landslides to the west. There are wetlands west of unit.” (p. B-101)

- Unit H24. “The unit is bordered by two lakes (Class I and II), one Class II stream, two Class III streams, and three Class IV streams”. (p. B-107) The forest stands are linked to the hydrology of this area. Harvest of the forest must inevitably affect patterns of water flow. The F.S. cannot provide assurance that mitigation measures will be effective in such a hydrographically complex network.

- Unit H25. “The unit is bisected by four streams and bordered by two.” (p. B-115).

- Unit H32. “The unit is bounded by streams on the north, southwest, and southeast, and there are six streams within the unit. Past logging across the stream from this unit has the potential to cause jams further downstream.” (p. B-153)

- Unit S42. “A class III stream has shown recent movement of large boulders and has very steep slideslopes abutting the unit. Resident fish reach to within nearly 300 feet of the unit boundary. High gradient areas in the northeast central area have the potential to add sediment to the channel leading to downstream fish habitat if disturbed.” (p. B-191)

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cont.

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SC-50

Road Networks

- According to the Forest Service, few published studies "have explicitly considered how road networks affect the routing of water through a basin. We therefore have little basis to evaluate the hydrologic functioning of the road system at the scale of an entire watershed or landscape." USFS 1999 at p.27. However, a recent Southeast Alaska publication recognized that:

"Disruption of groundwater flow by forest roads is perceived as a significant cause of damage to the forest ecosystem. Intercepted, concentrated, redirected, or disrupted groundwater flow by a road prism can lead to increased surface water, accelerated erosion rates, higher peak stream flow, and reduced soil moisture." (Hartsog, et al. 1997)

Alaska's anti-degradation policy, 18 AAC 70.015, was approved by the EPA in 1997. See 18 AAC 70.015. For "high quality" water bodies, waters whose "quality of water exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water." See 18 AAC 70.015(a)(2). For such water bodies "the quality must be maintained and protected," subject to certain exceptions.

- According to EPA's Questions and Answers on Anti-degradation, August 1985 (50 Fed. Reg. 34546), the benefit derived from the economic or social development in the area must "clearly outweigh" the benefit of maintaining the water quality and that the "burden of demonstration on the individual proposing such activity will be very high." Moreover, the EPA states that permits to degrade high quality waters should only be granted "in a few extraordinary circumstances." The Forest Service has not demonstrated in this EIS that the lowering of water quality is "necessary" (see specific demonstration requirements at 58 Fed. Reg. 20906-07 and 63 Fed. Reg. 36784) or that the economic or social development in the area is "important" (see specific demonstration requirements at 58 Fed. Reg. 20906-07, 20911 and 63 Fed. Reg. 36784).

Wetland Issues

- 28 percent of the entire project area is wetlands. Previously 17.2 miles of roads have been built in wetlands, and 338 acres harvested. The continuation of the existing hydrological flow patterns must not be harmed by timber harvest or road construction. Units are crisscrossed by streams and near wetlands.
- Currently, the Tongass National Forest does not have an approved method to evaluate the effectiveness of BMPs related to impacts of management activities on wetland functions and values." It is almost unconscionable that this task has not been completed in the more than five years the Tongass Plan has been in place. By utilizing the collective resources of the U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, and the U.S. Environmental Protection Agency, a system for evaluating impacts to wetlands and wetland functions could be

developed in a collaborative way. Until this task is done, the FS should be very conservative in wetland management.

SC-53
cont.

Mitigation and Monitoring

- Unit Cards reveal an extensive and expensive list of mitigation and monitoring tasks associated with the logging of the project's units. Typical mitigation and monitoring requirements include directional falling, wind firmness mitigations, setbacks around v-notches, areas of split line, partial, or full suspension yarding, enlarged buffers, seasonal restrictions, special tree leave requirements to meet VQO's, un-even management prescriptions, checking for the success of natural regeneration, harvest restrictions on steep or un-stable slopes, avoiding heavy equipment use and using skyline logging on McGilvery soils, and the use of BMPs for roads and stream crossings.

SC-54

- The Forest Service may not have the funds or the capability to carry out their obligations for implementing Mitigation Prescriptions, in particular the ability to monitor the operators for compliance. As noted above the requirements for this sale are extensive.

- Though the DEIS notes that the Forest Service is dependant on future funding in regard to the issue of their ability to carry out the DEIS's prescribed mitigations, they fail to reveal their past success in meeting these obligations. This information is necessary if reviewers are going to be able to assess the viability of the Mitigation Prescriptions. The commenters request that this information be provided and discussed.

Cumulative Impacts

- The Forest Service claims there are no other planned or expected timber sales within the Project Area (DEIS 3-55). This conflicts with other statements where the Forest Service repeatedly cites plans to do "Pre-Commercial Thinning" in the Project Area, and with the Unit Cards mitigation section where they cite plans to re-forest for the purpose of future timber harvests.

SC-55

- The Forest Service claims there are no other timber sale projects scheduled within the Juneau Ranger District but fails to reveal that all of the previous versions of the 10 year schedule included projects such as Hobart Bay, Gilbert Bay, Kensington, and St. James Bay. They fail to reveal that there is a high probability that these sales will return to the schedule if market conditions improve. For the record the commenters believe the probable reasons for the dropping of Juneau Ranger District sales from the 10 year schedule have more to do with public relations than with the Forest Service's actual intentions.

SC-56

- Past harvest in the Tongass National Forest tended to concentrate on certain landform types where forest conditions were most productive and access was easiest (Shephard et al, 1997) Today's logging should avoid these disproportionately targeted landforms.

SC-57

- The fact that 56% of the beach and estuary fringe within the project area is not NFS lands is very worrisome. The F.S. relies heavily on the beach and estuary fringe as a habitat reserve and travel corridor. Since half is potentially subject to development; remaining travel corridors inland assume more importance. Units that have been identified as travel corridors should not be logged (see Wildlife Section of these comments).

SC-58

Impact of possible SATP road

- Under the proposed S.E. Alaska Transportation Plan update and Juneau Access EIS, a transportation route under consideration for Juneau Access is the West Side of Lynn Canal. The West Lynn Canal Route is preferred by the Forest Service due to its lesser impact on Forest Service lands. (FOIA item #24. Freedom of Information Act response to Sitka Conservation Society FOIA to Forest Service, filed January 5, 2004. Email).
- The Forest Service should consider the potential relationship of vastly increased access to the Couverden area, and the consequent rise in importance of the areas recreational and tourism potential.

SC-59

ATV Damage

- An emerging issue in Southeast Alaska is damage done by irresponsible ATV riders. Locations in Yakutat and surrounding Sitka are beginning to evidence extensive damage in muskegs and stream crossings. Such damage can be expected to increase in this location as well. The F.S. has found it difficult to keep roads closed. The Tongass needs a regional ATV plan. In the absence of such a plan, please address this issue in project planning.

SC-60

Miscellaneous Issues

- There is a unit card missing from the Couverden DEIS. Alternative-6 for Unit H-32. It is 73 acres for that alternative.
- The DEIS states that the NEAT model includes a cedar component when calculating incomes. There is no discussion of the effect this may have for a sale such as Couverden (page 3-65, Table 3-23, note # 6).

SC-61

SC-62

References:

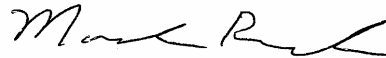
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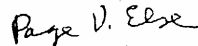
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Regards,

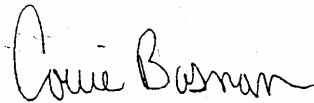
The Sierra Club
1055 Men. Pen. Rd. Juneau AK 99801
Mark Rorick, Chair, Juneau Group
(907) 789-5472



Sitka Conservation Society
201 Lincoln St., Suite 4
Sitka Alaska, 99835
Page Else, GIS Specialist
(907) 747-7509



Center For Biological Diversity
Box 6157
Sitka Alaska, 99835
Corrie Bosman, Alaska Program
(907) 747-1463



Response to Mark Rorick, The Sierra Club, The Sitka Conservation Society, and The Center for Biological Diversity

SC-1: Your comments on the Sierra Club, the Sitka Conservation Society, and the Center for Biological Diversity are noted.

SC-2: We do not agree that the DEIS fails to adequately disclose the full costs of this sale, uses an outdated Market Demand Model, relies on a faulty interpretation of the model, uses outdated information, and provides an inadequate and misleading Financial Efficiency Analysis. Please see the response to these comments below.

SC-3: The Public Investment Analyses in the Couverden EIS uses regional costs for the analysis because current direction requires us to use regional costs. This direction was reaffirmed in a letter signed by the Forest Supervisor, dated May 25, 2005. A copy of this letter is included in the Planning Record.

SC-4: Under current direction, timber would not be sold unless the sale is economically viable.

SC-5: Your assertion that smaller roadside sales would receive more and higher bids, while true for some areas, is not necessarily correct for Couverden. It is true in the sale program on Prince of Wales Island and similar places where roads are connected to the community. The isolated nature of this project area requires the mobilization of people and equipment not required for a small sale on a community road system. It is likely that the cost of an EA would be lower, but the EA would be completed for a far smaller harvest level. The cost per MMBF would not necessarily be lower. Also, the cost of repairing bridges and reconstructing the LTF would be the same for a harvest of a small amount of timber as for a large amount, making the cost per MBF higher. However, regardless of whether small sales are more or less economic compared to larger sales, the Forest is interested in meeting local demand (refer to the Purpose and Need section in Chapter 1). All action alternatives include the option of offering small sales. It may be true that small operators, selling smaller amounts of wood products in the local area and taking advantage of niche markets for their products, can operate at a profit where large operators cannot.

SC-6: The Forest Plan is based upon providing for the sustainability of resources, including meeting the resource needs of the local and regional economy (refer to Chapter 1, Purpose and Need). The Couverden project seeks to contribute to meeting this goal. How the Forest Service interpreted the Brooks and Haynes Report when it prepared the Forest Plan is a Forest Plan issue and is beyond the scope of this analysis. At the time of this response, this Forest Plan issue is in litigation [Case No. J03-0029 CV (JKS)].

SC-7: We do not agree that the DEIS misuses the Brooks and Haynes projections in Appendix A and elsewhere by stating that the annual market demand is 151 MMBF. At the time of this response, this Forest Plan issue is in litigation [Case No. J03-0029 CV (JKS)].

SC-8: The history of timber prices has been cyclical, rising, and falling in response to economic conditions at home and abroad. We see no reason that this decades-old pattern will end and that timber prices will remain low even though most, or all, other components of the economy expand.

SC-9: Appendix A has been updated. The version of Appendix A included in the DEIS was the most current information at the time the DEIS was prepared. The information is updated annually after the current Ten-Year Timber Sale Plan has been signed. The 2004 edition of the ten year plan was signed on January 12, 2004 by the Forest Supervisor, a month after the release of the DEIS and months after the analysis was completed. The information for 2004 has been included in Appendix A for this FEIS. However, due to the time it takes to prepare,

publish, and distribute this document, the 2005 Ten Year Timber Sale plan may have already been completed by the time the public receives the FEIS.

The volume currently remanded includes Emerald Bay as you noted and Indian River, which was remanded in 1999. The Indian River project would have contributed 23.8 million board feet of timber to the NEPA-cleared volume. There was no volume under litigation at the time the Couverden DEIS was prepared. Appendix A has been updated to reflect the information available at the time that the FEIS was completed. Because there may be several months in between that date and when this FEIS was prepared and when it was released to the public, this figure may or may not still be valid.

As you point out, volume from any timber sale cancellations that occurred in 2004 would become part of the NEPA-cleared volume and would raise that amount. This is part of the expected fluctuations of the timber market. Looking at this from another viewpoint, the delays in planned decisions on NEPA documents due to the 1999 ROD, the Roadless Rule, and litigation have not contributed to this pool. That is why it is important to look at timber demand over a longer period of time rather than at any one point in time.

SC-10: The information on the employment in the woods products industry has been included for 2002 in the FEIS. This is the most recent published information. The information for 2003 is still in the draft stage as the analysis was being prepared for the FEIS. This information will be released when it is finalized. This information is from various sources and needs to be verified. However, the point of the discussion was that employment in the wood products industry has declined due to the closure of the pulp mills and other changes. The trend shown on page 3-63 and discussed on page 3-62 of the DEIS is correct.

SC-11: In general, utility logs are not currently required to be removed. Individual projects may require their removal or may not, based on situation.

SC-12: The KV plan is likely to include a survey for regeneration and little or no additional work. Currently, this is all that has been planned. Precommercial thinning was recently completed on areas that were harvested in the early 1980s. This was not done using KV funds. No additional precommercial thinning is planned in the foreseeable future.

SC-13: Our method of calculating fair market value is the appraisal system. As stated in the DEIS, the financial efficiency analysis calculates the expected appraisal rate for a timber sale alternative using the NEPA Economic Analysis Tool (NEAT), which is based on the Forest Service's Transactional Evidence Appraisal (TEA) system. These values are estimated for planning purposes. Before any National Forest timber is actually sold, it is appraised to estimate the material's fair market value.

SC-14: Timber will only be sold at the appraised rate, unless competition results in a higher bid.

SC-15: We do not agree with this assessment. As noted on page 3-53 of the DEIS, the Forest Plan recommends a road density of 0.7 to 1 mile per square mile. None of the alternatives would raise the level above 0.7 mile per square mile because all new roads would be closed. Also, 0.8 mile of road that is currently open is recommended for closure to reduce impacts to wildlife. The project is not expected to have a significant effect on the local deer population. Currently, there is little hunting of deer and new roads will be closed, limiting additional increased hunter access to some degree (refer to page 3-55 of the DEIS).

SC-16: All alternatives would meet Forest Plan direction. Refer to the analysis in Chapter 3, Issue 2: Wildlife Habitat for a discussion of the effects of the alternatives on wildlife.

SC-17: The deciding official may select any of the alternatives, including Alternative 2, or any combination of the alternatives.

SC-18: The agency gave the Vi-Pop Committee's work the required "hard look," but in the end, exercised its right to choose between scientific opinions. The federal regulatory agencies found that the Forest Plan's biodiversity strategy is adequate.

SC-19: It is correct that the DEIS tiers to the Forest Plan. The federal regulatory agencies found that the Forest Plan's biodiversity strategy is adequate.

SC-20: We are not aware of any planned developments on private lands in the Couverden area; therefore, we stated that there are no reasonably foreseeable developments. Please see the response to SC-58 below.

SC-21: For the reasons stated above, as well as for the information provided in the EIS, we do not agree that the DEIS is in error when it states that there would be no significant impacts to wildlife.

SC-22: The 500-foot riparian foraging buffer to protect important brown bear feeding areas is applied as per Forest Plan direction, as discussed on pages 3-37 and 3-38 of the DEIS. No harvest is proposed within 500 feet of Homeshore Creek under any alternative.

SC-23: Wildlife corridors and connectivity between various habitats, such as corridors linking the beach and alpine areas, are discussed in the Wildlife section of the DEIS (most importantly under Wildlife Corridors and Habitat Connectivity, pages 3-31 and 3-33 and Brown Bear, pages 3-37 and 3-38). Also, four units were dropped in the Homeshore drainage in order to protect travel corridors (Alternatives Considered but Eliminated from Detailed Study in Chapter 2).

SC-24: The preferred alternative would harvest approximately 300 of the nearly 8,000 acres of coarse canopy old growth in the project area (Table 3-14). This is less than 4 percent of the coarse canopy forest in the project area. We do not believe that this is an excessive amount.

SC-25: Unit HS5 would be selectively harvested under Alternatives 2 and 3 and not harvested under Alternatives 4 and 6. A smaller version of the unit would be selectively harvested under Alternative 5.

SC-26: Unit H12 does contain medium winter habitat for deer, and we agree that although partial retention harvest methods will preserve some habitat, disturbance may cause wildlife to avoid that area during harvest operations. We believe that this will be a short-term disturbance. Please note that harvest will not occur in the winter.

SC-27: You are correct, Unit H15 does contain high-value habitat and previous clearcuts adjacent to the unit may have affected wildlife movement. As you point out, this is stated in Appendix B of the DEIS (page B-71). Please note that the swatch of high-volume old growth adjacent to the south and west of the unit would not be harvested at this time.

SC-28: You are correct that Unit H25 contains a travel corridor in the western portion of the unit. As you point out, this is stated in Appendix B of the DEIS (page B-116). Please note that the quarter-mile-wide swatch of high-volume old growth adjacent to the west side of the unit would not be harvested at this time.

SC-29: You are correct that a black bear was sighted in Unit H29. As you point out, this is stated in Appendix B of the DEIS (page B-145). Black bear are fairly common in the project area. They are not a protected species. Also, see SC-31 below.

SC-30: You are correct that Unit S36 contains travel corridors in the northwest corner of the unit. As you point out, this is stated in Appendix B of the DEIS (page B-167). Please note that trees will be left in this portion of the unit as mitigation.

SC-31: Please see the response to SC-29. Also, viewing black bears in the project area is not a significant, or even a noteworthy, source of economic activity. Also, this portion of the project area is not important foraging habitat for bear. The area along a portion of Homeshore Creek is important foraging habitat and, therefore, is protected with a 1,000-foot no harvest corridor (500 feet on each side of the creek).

SC-32: The DEIS analyzed both the 1997 roadless inventory and the newer inventory prepared for the SEIS. Effects on both areas are disclosed in the DEIS. Please note that the roadless rule no longer applies to the Tongass National Forest. Your statement that this is a temporary exemption is not correct. See the discussion under Issue 1 in the FEIS.

SC-33: The decision maker may select any alternative, or mix of alternatives, analyzed in the EIS.

SC-34: The Forest Plan's extensive system of stream buffers protects fish habitat and water quality. Both the state and federal regulatory agencies recognize this. Also, the Alaska Department of Environmental Conservation concurs that the project is consistent with the Alaska Coastal Management Program for water quality aspects of the sale.

SC-35: Timber would only be sold if timber prices rise to the point where the sale is economical, as noted in the DEIS.

SC-36: Adopting new Forest-wide standards and guidelines, such as those recommended in PAC Fish, is beyond the scope of this analysis.

SC-37: You are correct that there would be seven Class I stream crossings and nine Class II stream crossings under Alternative 3. This is the same number as currently exists. No additional Class I or II crossings would be created. There would be 42 Class III stream crossings and 36 Class IV stream crossings under Alternative 3. This would be an increase of five Class III and four Class IV crossings (Table 3-57 in the DEIS). However, these additional crossings would be removed or bypassed after the sale, restoring drainage. This is disclosed in the EIS in several places (including page 3-134 of the DEIS). There would be about 400 acres of wetlands affected cumulatively. This would be an increase of approximately 70 acres. This is also disclosed in several places in the EIS (including Table 3-62 of the DEIS). Please note the figure of 400 acres includes many areas that were logged in the early 1980s and now support young wetland forest.

SC-38: We do not agree that most tail holds will be in stream buffers. Those tail holds that are in a buffer are likely to be in outer, higher portions of the buffer; therefore, stream bank disturbance is unlikely.

SC-39: Unit HS5 is separated from the Class I stream by at least 500 feet in any direction. In addition, the EIS recommends closing 0.8 mile of the existing Homeshore Road to reduce access to critical bear feeding habitat (refer to pages 3-189 and 3-190 of the DEIS).

SC-40: The mitigation measures included to protect the stream in Unit HS10 are listed on page B-41 of the DEIS.

SC-41: The term "non-stream" refers to areas less than 1 foot wide that may occasionally run small amounts of water during a heavy rain. Mitigation measures to protect water quality are listed on page B-49 of the DEIS. Note that the closest fish habitat is more than half a mile from the unit.

SC-42: The boundary along the north border of Unit H14 was pulled well away from the stream. The unit is between 100 and 150 feet from the stream. Refer to the map on page B-64 of the DEIS. Mitigation to protect the stream are listed on page B-65 of the DEIS.

SC-43: Mitigation for Unit H15 includes a buffer that is at least 130 feet wide and no harvest on unstable slopes above the creek. Refer to the map on page B-70 of the DEIS. Mitigation to protect the stream are listed on page B-71 of the DEIS.

SC-44: Mitigation to protect the stream along the south side of Unit H16 includes avoiding harvest in the V-notch of the stream and on steep slopes. These measures are listed on page B-77 of the DEIS.

SC-45: Mitigation to protect the stream near Unit H18 includes a no harvest buffer at least 120 feet wide and avoiding harvest on steep slopes. These measures are listed on page B-97 of the DEIS.

SC-46: Mitigation to protect the stream near Unit H19 includes a no-harvest buffer at least 120 feet wide, avoiding harvest on unstable slopes, and careful placement of the temporary road to ensure that it avoids unstable areas. These measures are listed on page B-101 of the DEIS.

SC-47: Unit H24 is at least 200 feet from either of the two lakes (page B-107 of the DEIS).

SC-48: There are four streams in Unit H25 and two that border it under Alternative 2 but not under Alternative 3, the preferred alternative. Under Alternative 3 the unit would be divided into two small units that together are less than half the original size. There would be extensive buffers protecting the streams that still border or run through this unit (refer to the map on page B-118 and the mitigation on page B-119 of the DEIS).

SC-49: Mitigation measures to protect the streams in and near Unit H32 include a no-harvest buffer at least 120 feet wide on Class II stream segments below the unit, no-harvest buffers on Class III streams, and other measures (refer to pages B-1153 and B-154 of the DEIS).

SC-50: Mitigation measures for the stream near Unit S42 include a selection harvest prescription in the unit and a no-harvest buffer along the Class III stream west of the unit (page B-191 of the DEIS).

SC-51: We are aware that Alaska's anti-degradation policy requires that water quality must be maintained for high-quality water bodies. We agree that roads can intercept groundwater. Please note that the Alaska Department of Environmental Conservation concurs that the project is consistent with the Alaska Coastal Management Program for water quality aspects of the sale.

SC-52: The Wetland section of the DEIS discloses that approximately 28 percent of the project area is wetlands, 15.3 miles of roads have been built across wetlands in the past, and that 335 acres of wetlands were harvested in earlier sales. The Fisheries and Watershed section analyzes past and expected effects to streams within harvest units.

SC-53: The Forest Service has an effectiveness monitoring program for BMPs and results were reported in the 2002 Annual Monitoring Report (pages 2-107 to 2-123). Past effectiveness monitoring has concentrated on temperature and turbidity. The Corps is responsible for administering Section 404 of the Clean Water Act. Wetlands Standards and Guidelines of the Tongass Land Management Plan (page 4-111) and BMPs that address protective measures regarding wetlands that apply to this project will be adhered to.

SC-54: The unit cards list mitigation measures to be employed during project implementation, including items to be left or things to be done during layout and harvest. The Tongass Land Management Plan monitoring plan lists monitoring requirements. Timber sale administration

and road construction inspection are costs taken into account in the budget formulation process. Timber sale administrators and engineering representatives monitor every ongoing road construction project and timber harvest unit. Applicable BMPs and mitigation measures specific to each harvest unit and road segment are monitored for implementation on every project. Project implementation monitoring is reported annually in the Tongass Annual Monitoring Report. Completed projects may also be selected for review by an interagency monitoring team following completion of a specific unit or road segment. Those monitoring results are reported as well. The track record for implementation monitoring has been excellent since monitoring of the 1997 Forest Plan was initiated. The FY2002 Monitoring Report shows a variety of BMPs required as mitigation on roads and harvest units. Of the 217 times these BMPs were implemented, the objective was accomplished 202 times. Corrective action was necessary only 12 times to accomplish the objectives of the BMPs.

SC-55: The DEIS does not state that there will never be another activity in the project area, it just states that there are no other planned or expected timber sales in the project area in the foreseeable future. This is defined as the next 5 to 10 years. It is certainly possible that sometime in the future there will be other timber sales in the area but none are planned at this time. The current Forest Plan will be revised in the future and we have no way of knowing if the Couverden area will include LUDs that permit timber harvest or what standards and guidelines may apply during the next planning period. These standards and guidelines have changed significantly over the past 20 years and may continue to change as new scientific information is gained. We cannot analyze the effects of sales that may or may not occur in the future under unknown standards and guidelines.

SC-56: You are correct that previous versions of the 10-year action plan included projects such as Hobart Bay, Gilbert Bay, Kensington, and St. James Bay, and that one or more of these proposed sales may be analyzed in the future. However, none of these sales is in the project area, and none is even near the boundary of the project area.

SC-57: We are unclear as to the intent of your comment that harvest should be avoided on landform types where the land is productive and where there is easy access because past harvest tended to have been concentrated on these landforms. Is it your suggestion that we instead harvest in hard to access unroaded areas and/or in unproductive areas. If this is not the recommendation, then we do not understand which landform types you are suggesting we harvest in.

SC-58: The majority of this non-National Forest System land is not subject to logging. The shoreline in VCU 1170 is a State Park. Management under the State Park System does not include timber harvest, thus preserving potential travel corridors from salt water into the uplands in VCU 1170 is not an issue. Other areas along the shore are small holdings with a cabin. We do not consider it likely that the owners of these cabins will clearcut their back yards. Letters from cabin owners that we have received for this project indicate their desire to live in a "natural forested setting."

SC-59: The West Lynn Canal alternative in the Juneau Access project would, if selected, result in a ferry route across Lynn Canal to a terminal in the vicinity of William Henry Bay. That is approximately 24 miles north of the project area, and is unlikely to generate any additional recreational use in the Couverden project area beyond that already experienced.

SC-60: Developing a Forest ATV Plan is beyond the scope of this analysis. ATV use or damage has not been an issue in the Couverden project area. Current use is light and is primarily that of hunters and others participating in subsistence activities. The isolated nature of this road system makes it unlikely that ATV use will reach portions requiring extensive control measures to protect natural resources.

SC-61: Thank you for pointing out that there is a unit card missing. The unit card for Unit H32 listed Alternatives 2, 3, and 4. It should also have listed Alternative 6. This has been corrected in the planning record.

SC-62: The NEAT program is a means of comparing one alternative against another, as well as for assessing whether or not a particular alternative is within a range of costs and values that may allow a purchaser to bid on and operate a sale at a profit. This is for the purposes of the environmental analysis leading to a decision as to where and how much timber volume to offer for sale within the project area, and under what conditions. The timber sale appraisal process is used to “fine tune” timber sales when cruised timber volumes are available and unit boundaries are laid out with all mitigation measures incorporated. The sale will be sold based on the measurement of actual volume in each unit, rather than on the results of the NEAT analysis.

Written Comment Sheet
Public Meeting for the Couverden Timber Sales DEIS

Vince Schafer

RECEIVED

MAR 31 2004

Date: 3-28-04
Juneau Ranger
District

Thank you for your input.

PLEASE PRINT:

The proposed timber sales for the Couverden area offer a unique opportunity for the local communities in the surrounding area.

In Gustavus, alone, there are at least 3 working saw mills. They are all small operations, but they are supporting families and are bought and paid for. There are also numerous craftsmen including carpenters, wood carvers, furniture makers, sign makers, and cabinet makers; all making a living.

Multi-million board foot, one time sales, have little meaning to small operations. What is needed is a sustainable supply of timber; to be harvested as needed. What the big sales do mean to us is that the timber will be gone when we need it.

Alternative 5 offers the opportunity to sustain the local economy with local resources. The timber would be harvested locally, processed locally,

VC-1

VC-2

VC-3

(over) →

****Continue on back for more space****

NAME: Vince Schafer
ORGANIZATION: Local Logger, sawmill operator
E-MAIL ADDRESS:
MAILING ADDRESS/CITY/STATE/ZIP: P.O. Box 172, Gustavus, AK 99826

Names and addresses will be added to the mailing list for the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

Comments may be mailed to:

DAVE Carr
Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

and sold locally. The most value would be gotten for each log.

It's a win-win situation. Alternative 5 proposes ^{VC-3} ^{cont.} little impact on the area ecologically and visually. The cost to the Forest Service and ultimately the TAX payer would be minimal. IT provides a permanent, sustainable resource for the economy of the area.

Thanks,

Vince Schafer

P.O. BOX 172

GUSTAVUS, AK, 99826

697-2292

Response to Vince Schafer

VS-1: Your comments on the need for small sales to supply local mill operators are noted. All action alternatives include the option of offering small sales.

VS-2: Both small and large sales could be offered under the preferred alternative.

VS-3: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

Cascadia Wildlands Project

Alaska Field Office

POB 853
Cordova, AK 99574

March 29, 2004

Couverden Timber Sales Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

Please accept the following comments of Cascadia Wildlands Project, and myself as an individual, regarding the Couverden Timber Sales DEIS.

There is no need for the Forest Service to offer this timber sale. Existing supply already meets the demand. Demand for trees in this area is already small, and is diminishing further as a result of global economic factors. We don't need these trees now, and will need them even less as time moves on.

CWP-1

Even supposing there were a demand for more Tongass timber, none of the proposed sales meet minimal economic criteria. It is an absurd waste of taxpayer dollars to offer uneconomic timber sales. The Forest Service should get out of the old-growth logging business.

CWP-2

The economic analysis in the DEIS is overly optimistic and highly speculative. For example, the statement (page 3-65) that this sale "would play an important role in the overall...sales program, helping to meet market demand for timber and retain existing employment levels" depends on a series of optimistic (and unwarranted) assumptions. This statement assumes someone local bids on this uneconomic sale, and that they don't export the trees.

CWP-3

The DEIS economic analysis mistakenly ignores the impact that sale economics play in whether and how trees are cut. The conclusion that Alternative 2 would have the greatest economic benefits ignores the fact that alternative is among the least economic. Alternative 6, with much more favorable economics, is more likely to be sold than Alternative 2—therefore its impact is greater.

CWP-4

The economic analysis should include private, state, Mental Health and University land in its demand calculation. Other landowners are offering huge sales at a fraction the cost of Forest Service sales. Logically that diminishes market demand for National Forest trees.

CWP-5

While we appreciate your efforts to explore alternatives to clearcutting, we have little faith that partial harvest is effective at mitigating environmental impacts. The DEIS falsely states that uneven-age and two-age harvest prescriptions “closely mimic natural disturbance events.” (DEIS @ 1-14) Blowdown, the predominant natural disturbance in this area, churns soil, increases large woody debris, and establishes patterns entirely unlike anything loggers can create. The difference between the two is most pronounced in terms of impacts to soil. Whereas blowdown churns the soil (with ecological benefits only scarcely understood), logging compacts it. Partial harvest prescriptions also tend towards highgrading the biggest and best trees, which has negative genetic and ecosystem impacts.

CWP-6

Thank you for dropping four of the proposed units in the Homeshore watershed in consideration of brown bear habitat. We urge that you stay out of the Homeshore watershed altogether. We also note that these units are only being delayed “until forest in adjacent areas (harvested in the early 1980s) has matured to the point that it can provide alternate travel corridors for bears.” (DEIS @ 2-2) At what point will that be? What is the practical impact of the decision now to delay harvest? This decision is significant to cumulative impacts analysis, as it means future harvest of these units is reasonably foreseeable.

CWP-7

Thank you for the section on monitoring. We agree that implementation monitoring is important, and urge that action only be permitted to the degree that adequate implementation monitoring can be done. It is unfortunate, however, that effectiveness and validation monitoring are not being done as part of project implementation. (DEIS @ 2-5) Forest Plan standards and guidelines are being relied on to such a degree that monitoring their effectiveness must be done on the project level. Such monitoring would inform development of future forest plans and timber sales, and allow project-specific changes to mitigate impacts.

CWP-8

We strongly oppose any logging or roadbuilding in roadless areas. It is amazing to us that, after the immense outpouring of national sentiment for protecting the Tongass’ roadless areas, the Forest Service continues to propose destroying them. Every alternative in the DEIS intrudes on the roadless area. Why weren’t alternatives without these impacts considered? We value roadless areas for ecological, spiritual, and recreational reasons, and (again) urge that they be permanently protected. For this project, please drop all units and roads that would intrude on the Chilkat-West Lynn Canal Roadless Area.

CWP-9

We are concerned that road maintenance will not be done over the long term. While some, limited improvements have been made in recent years, the Forest Service has an abysmal record of upkeep for logging roads. Please provide assurances that maintenance needs will be met, and evaluate environmental impacts of failing to do this maintenance.

CWP-10

The conclusion that the preferred alternative “would not adversely affect wildlife habitat,” is absurd. (DEIS @ 2-13) Why even suggest such a thing, when even your own analysis discloses significant impacts to habitat? It might be reasonable to assert that impacts are acceptable, or small, or can be mitigated—but stating flatly that there aren’t

CWP-11

any adverse impacts is inexcusable. Please do not persist in making this groundless assertion.

The DEIS overstates the value of beach and estuary fringe buffers for habitat and habitat corridors. Most of the beach is private or state land, and could be harvested. Most of the forest on the beach is not coarse canopy old-growth, and so has limited utility for old-growth oriented species.

CWP-12

Please do not build any roads, or cut any trees, on wetlands. It is practicable to avoid *all* wetlands.

CWP-13

It is untrue that “no timber harvest would occur in the RMAs...” (DEIS @ 3-21) Road building would cross riparian areas, and of necessity involves cutting trees. Calling it “ROW clearing” instead of “timber harvest” doesn’t change the fact that trees will be cut down.

CWP-14

The DEIS relies to an incredible extent on the Forest Plan Standards and Guidelines to mitigate impacts. This over-reliance is improper for several reasons:

1. Forest Plan standards and guidelines do not obviate NEPA’s requirement to analyze impacts.
2. The DEIS fails to disclose what, specifically, these standards and guidelines are.
3. The DEIS fails to analyze effectiveness of the standards and guidelines. The fact that some mitigation has been conceived that addresses a particular concern, does NOT mean that the concern disappears. The Forest Plan never claimed to solve every problem.

CWP-15

Road building will have significant impacts to wildlife even though roads will theoretically be closed after harvest is complete. The DEIS fails to appreciate this. Putting up a “road closed” sign does not remove the road. Roads, once closed, will be again re-opened for future timber harvest and pre-commercial thinning. Closed roads are still useable for humans and animals alike. Habitat impacts of roads persist, whether or not people are allowed to drive down them. For example, roads are known to improve mobility and hunting success of wolves, which can have unforeseen consequences to deer, moose and wolf populations. The impact of roads on hydrology, in particular in wetland areas, commonly persists even after closure and/or obliteration.

CWP-16

All proposed action alternatives would have unacceptable impacts in terms of habitat fragmentation. The DEIS analysis of interior habitat (p.3-28), while overly mechanistic in its approach, does disclose that these impacts would be severe. Unfortunately, that lesson is not carried over into the analysis of impacts to wildlife or cumulative effects. The proposed fragmentation of this forest, particularly when the cumulative impact of past and future harvest is considered, is unacceptable.

CWP-17

The DEIS claims that “effects of roads on particular wildlife species are discussed in the Wildlife Species portion...” but the fragmentation effects of roads are not addressed.

CWP-18

Road building has severe impacts related to fragmentation, which should have been considered.

Please drop units HS5, HS7, HS8, H25, and H32, in order to preserve travel corridors for moose, deer, bear, marten, goshawks, and other wildlife. Please also understand that other travel corridors have not been documented, and that most critters don't travel the same way people do. Most don't cut a B-line from one place to another, so preserving narrow strips through which they might travel doesn't necessarily preserve habitat connectivity.

CWP-19

The DEIS overstates the case in saying "reserve tree/cavity-nesting habitat standards and guidelines of the Forest Plan conserves habitats for these species." (DEIS @ 3-35) The sentence should read "...*may* conserve *some* habitats for these species," and it should be followed up with a site-specific analysis. Standards and guidelines are better than nothing, but not much better. In any event, the DEIS provides no scientific backing for this claim, and hasn't done any project-specific analysis.

CWP-20

The DEIS section on Mountain Goat is very weak. How many goats live in this area? Were any surveys done? What areas provide winter goat habitat? It is insufficient to just apply a computer habitat model.

CWP-21

What does it mean that for other species of concern, "there are no anticipated significant effects due to implementation of current Forest-wide Standards and Guidelines..." (DEIS @ 3-48) What standards and guidelines? Why are we so sure they adequately protect all these species? This is exactly the type of blind reliance of the Forest Plan that will get us into trouble.

CWP-22

The DEIS fails to consider possible disturbance impacts to Marbled Murrelets from helicopter logging. Please include this analysis in the FEIS. Or, better yet, drop helicopter logging from consideration altogether.

CWP-23

Unit H24, adjacent to the lake where a goose family was observed, should be dropped.

CWP-24

Thank you for disclosing that the Forest Plan standards and guidelines were a major reason why the Alexander Archipelago Wolf is not currently listed as a threatened species. Understand that we are flirting with extinction here, and adequate protection of wolves at the project level is essential.

CWP-25

We are confused with the use of the deer HSI to conclude that harvest will not impact wolves. (DEIS @ 3-53) This appears to be an inappropriate use of the model, which isn't designed to accurately guess actual numbers of deer. Wolves don't care whether or not your computer says there *should* be enough deer for them to eat, they need actual deer to eat.

CWP-26

The impact of roads on wolves has been understated. The DEIS fails to disclose the impact of roads on wolf travel, distribution and hunting success. Action alternatives also appear to push road density above the .7 mile per square mile standard given in the Forest

CWP-27

Plan. If road density is currently .5, and action alternatives add up to .2, then that equals .7. Yet the DEIS claims densities “would remain at or below .6 mile per square mile.” (DEIS @ 3-55) Is there something else going on here, or is my math really bad?

The cumulative effects analysis is insufficient. The DEIS claims “there are no other planned or expected timber sales on NFS land within the project area.” (DEIS @ 3-55) This statement ignores the delayed harvest of units in the Homeshore watershed. It also ignores pre-commercial thinning projects, which are anticipated here. It also ignores the fact that the current 10-year schedule of timber sales certainly won’t be the last. Much of the project area is designated for timber harvest, and it is reasonable to suppose it will be put to that use.

The DEIS also takes an overly mechanistic approach to analyzing cumulative effects. You seem to be adding up past, present, and future harvest, then taking that acreage total and calling it the cumulative effect. This approach ignores the simple lesson that the whole is more than the sum of the parts. Impacts from disturbance, open roads, road maintenance, and loss of connectivity are not appreciated by just adding up acres. For example, the combined effect of HS7 and HS5, with adjacent clearcuts from 1981 and 1982, is one giant logging unit. For at least the next 100 years this strip will fragment the Homeshore valley from the steep mountainside. Similarly, Unit HS8 will unite with cuts from 1992, 1990, and unit HS9 to create a very large contiguous opening. In 20 years, and for the 100 years after that, this whole area will be dense, closed canopy re-growth—unusable for most local wildlife. Yet, the DEIS ignores these impacts entirely.

CWP-28

The gross percentages of acres harvested are a product of an arbitrarily large circle of land called the “project area.” If the “project area” were limited to the actual project area, these percentages would all be much higher. We see no scientific basis for evaluating cumulative ecological effects based on this “project area.”

CWP-29

We generally support pre-commercial thinning projects for ecosystem and economic benefits. These projects are not without costs, however, so please plan now to accomplish pre-commercial thinning later.

CWP-30

The DEIS states: “road access is important to the economic feasibility of timber harvesting and alternatives with more road construction provide more opportunities for future economical harvest operations.” (DEIS @ 3-73) We believe this statement is true. The same analysis should be applied to cumulative ecological impacts. There is no good reason why the positive cumulative economic impacts of road building should be considered, while negative cumulative ecological impacts are ignored.

CWP-31

We are concerned with the certainty that more logging and road building will result in more landslides, erosion, loss of productive soil, and adverse changes to soil’s physical characteristics. The DEIS fails to analyze these impacts. In particular, it ignores the role windthrow plays in soil development. The analysis of soil productivity is overly broad and shallow. What is the impact of this project on soil productivity?

CWP-32

The DEIS relies on the Forest Plan to mitigate landslides by avoiding slopes over 72%. However, “almost two-thirds of the observed landslides with slope data occurred on slopes less than 72 percent.” (DEIS @ 3-113). This is a clear example of where Standards and Guidelines and BMPs cannot reasonably be expected to succeed. Why do you conclude that BMPs and mitigation are sufficient to prevent landslides here, when the clear evidence indicates otherwise?

CWP-33

The DEIS does a good job of explaining the ways that logging and roadbuilding degrade streams and fish habitat. However, the actual evaluation of impacts rests on 100% effectiveness of mitigation measures. Even “well built” roads can impede fish passage, result in debris torrents, and introduce sediment. Even well-maintained machines leak oil. Most of the impacts of logging on streams are inherent in the business. Buffer zones and other mitigation measures have an impact, but they do not erase all problems. Even if they did, it is unrealistic to suppose loggers will do everything “right” all of the time. It only takes a slight lack of skill, for example, for a cable yarder to catch a stump with a log and cause a landslide. Logging is an imperfect and messy business.

CWP-34

The cumulative effects analysis for watershed and fisheries is clearly inadequate. Again the DEIS takes a strictly mechanistic approach, adding up road miles, acres harvested, etc. This approach ignores interplay of impacts. For example, the repetition of building a road, closing it, building it again, closing it, building it again, closing it, on and on, has more impact on water quality than doing it just one. Logging units are evaluated in gross numbers of acres harvested as a proportion of total watershed size, taking no account of vegetation and habitat type, or site-specific peculiarities. A glance at the maps and photos, however, presents an obvious picture of highly roaded and heavily logged watersheds.

CWP-35

Action alternatives would have unacceptable impacts to goshawks. The DEIS again relies entirely on listings of gross harvested acres and overall reduction in interior habitat, and on the Forest Plan. The DEIS does not state what the impacts to goshawks are expected to be, and fails to cite any of the abundant literature documenting logging impacts to goshawks. This small level of analysis is unacceptable given the importance of protecting the threatened goshawk populations.

CWP-36

It is disappointing that interference with subsistence use of the area (especially fall moose hunting) is given so little weight. A big logging camp here will greatly increase competition for subsistence users, and directly exclude subsistence users through area closures. Bear, moose, goat and deer will likely be taken by loggers.

CWP-37

We strongly urge adoption of Alternative 1, No Action.

CWP-38

Thank you for thoughtfully considering these comments.

Sincerely,

Gabriel Scott
Alaska Field Representative
Cascadia Wildlands Project

Response to Gabriel Scott, Cascade Wildlands Project

CWP-1: The reasons for considering this project at this time are discussed in the Purpose and Need subsection of Chapter 2 and in Appendix A.

CWP-2: The DEIS discloses that none of the alternatives are economical under current market conditions. If timber prices increase by approximately \$20 /CCF (\$40/MBF), Alternative 6 would be economical. An increase of approximately \$46/CCF would make Alternative 3 economical. Refer to Table 3-27 in the DEIS. Please note that timber would not be sold unless timber values were to increase to the point that the offered sale is economical.

CWP-3: The economic impact analysis is based on the assumption that the sale would sell. The analysis also assumes that the logs will be processed locally. Restrictions on exports of raw material from the Tongass currently limit log exports to Alaskan yellow cedar and a portion of the western red cedar harvest, neither of which are present in the proposed units. Sitka spruce and western hemlock, the species that comprise the Couverden timber sales, are expected to be processed locally to support wood products jobs in Alaska. Market demand is discussed in Appendix A.

CWP-4: As noted above, the economic impact analysis is based on the assumption that the sale would sell (see Table 3-23). Estimates of potential employment and income are based on job to harvest ratios (jobs/MMBF) and, therefore, potential impacts increase proportionately with increases in volume. The projected volume is largest under Alternative 2 and, therefore, projected employment and income levels would be largest under this alternative, assuming that the sale would occur. Estimating the potential economic impacts of the sale is one part of the economic evaluation process. The second part of the evaluation process requires that the decision-maker consider the likelihood that the sale would sell based on the expected appraisal rates (Tables 3-26 and 3-27) among other factors.

CWP-5: The process that the Forest Service follows to develop expectations about the market demand for timber is summarized in Appendix A. The Tongass National Forest's analysis of volume to be offered is based on projected annual market demand, as well as projected long-term timber demand. Annual market demand is, as the name suggests, calculated on an annual basis. One of the components of this estimate is the projected share of industry raw material to be provided by the Tongass National Forest. The process that the Tongass National Forest employs to develop estimates of market demand is, as noted in Appendix A, described in detail in Morse (2000a; 2000b).

CWP-6: The statement under Issue 4 (page 1-14 of the DEIS) did not state that uneven-aged systems closely mimic natural disturbance events. It says that they may mimic them, while clearcutting may not. This was posited as an issue raised by the public for consideration in the analysis, not as a fact. We agree that there are substantive differences between selective harvesting and natural disturbance events such as blowdown. These are discussed under Issue 4 in Chapter 3. You are correct that blowdown often causes soil disturbance and adds large woody debris to the forest floor. It is likely that some of the trees left in units where two-aged and uneven-aged harvest prescriptions are implemented will blow over, causing some soil churning and adding large woody debris to the forest floor. Outside of areas upon which new roads are constructed, little soil compaction is expected due to the deep organic soils of the project area and the type of yarding systems proposed.

CWP-7: We are glad that you concur with our proposal to postpone consideration of the four proposed harvest units in the Homeshore watershed. Alternatives 4 and 6 would not harvest any units in that drainage and Alternative 5 only harvests a small amount of area in the Homeshore watershed and only uses selection harvest. No decision has been made on when or if these units would be harvested. Harvest will be considered at some future date based

upon habitat conditions and Forest direction that apply at that time (perhaps 3 to 5 decades from now). We have no way of knowing what the future Forest Plan direction may be; therefore, any possible harvest (or decision not to harvest) is not foreseeable.

CWP-8: We agree that monitoring is important. The Forest has a monitoring program, which is discussed in Chapter 2 of the EIS.

CWP-9: While there is no prohibition against entering inventoried roadless areas on the Tongass National Forest, only Alternative 2 includes harvest and/or road building in the roadless area. Alternatives 3, 4, and 6 do not enter the roadless area. Some units proposed under these alternatives would be within 600 feet of the roadless area but would not enter them. Alternative 5 would not harvest any units within 600 feet of the roadless area or build any roads (in or out of the roadless area).

We strongly disagree with the statement that the Forest Service proposes to destroy the roadless area. The Chilkat-West Lynn Roadless Area covers approximately 198,109 acres. More than three-quarters of the roadless area are managed under LUDs that do not permit timber management. Alternative 2 proposes harvesting 58 acres of this 198,109 acres and building 0.6 mile of road along the boundary this decade. We do not see how harvesting trees on 0.0003 percent of the roadless area could be construed as destroying the roadless area. Please note that the preferred alternative (Alternative 3) and Alternatives 4, 5, and 6 do not propose entering the roadless area.

CWP-10: Your concerns about future road maintenance budgets are noted.

CWP-11: We agree that the statement on page 2-13 of the DEIS that the preferred alternative would not affect wildlife is incorrect. Effects on wildlife are disclosed in Chapter 3. We intended to say that there would not be significant effects on wildlife. This has been corrected in the FEIS.

CWP-12: We do not agree with the statement that the value of 1,000-foot beach and estuary fringe buffers for providing habitat and travel corridors is overstated in the DEIS. Discussion on page 3-17 and 3-18 and Table 3-4 state what is currently classified on the ground. This includes 534 acres of high-volume old growth and 144 acres of coarse canopy structure. The possibility of harvest on the privately owned lands was not considered as reasonably foreseeable for this project; therefore, possible harvest was not analyzed. Please refer to the response to SC-58.

CWP-13: The DEIS recognized the value of wetlands and the proposed alternatives avoid building roads on wetlands wherever practicable; however, given the soils and rainfall levels in Southeast Alaska, forested and scrub-shrub wetlands are spread throughout the project area and cannot be entirely avoided. Higher-value wetlands (i.e., estuary wetlands, bogs, fens, and lacustrine wetlands) are avoided by all alternatives.

CWP-14: You are correct, it is technically incorrect to say that no timber harvest would occur in the RMAs. Some trees would be cut as part of road construction under Alternatives 2 and 3 and, to a lesser extent, 4. No roads would be built under Alternative 5 and roads would follow existing rights-of-way under Alternative 6. Our intent was to indicate that, other than road construction, there would be no harvest in the RMAs. Thank you for pointing this out. This has been clarified in the FEIS.

CWP-15: The DEIS does rely on Forest Plan standards and guidelines to avoid adverse effects on resources. We disagree with your statement that this is not appropriate. The Forest Plan standards and guidelines were developed and approved for this very purpose. Appendix B, Unit Cards, Appendix C, Road Cards, and Appendix D, Site-Specific Mitigation Measures, list standards and guidelines that apply to the proposed project. Appendix B and Appendix C

also list applicable BMPs. Additional standards and guidelines, such as the requirement that old growth reserves be identified and maintained in a specific manor and protection of habitat in the beach fringe, are discussed in Chapter 3. Many others, such as the allocation of most forest lands to LUDs that do not permit timber harvest, are inherent in all activities under the Forest Plan. Refer to the Forest Plan for discussions of these measures.

CWP-16: We agree that even closed roads can affect wildlife. This is disclosed in Chapter 3 of the DEIS under the grizzly bear, marten, and wolf sections, as well as the section on cumulative effects.

CWP-17: The effects of fragmentation are discussed in the various wildlife species subsections and are disclosed under cumulative effects on page 3-57.

CWP-18: Please see response to comment CWP-17.

CWP-19: Your request that units HS5, HS7, HS8, H25, and H32 be dropped in order to preserve travel corridors is noted. Not all of these units are included in all alternatives, and effects on travel corridors by alternative are discussed on page 3-31 of the DEIS.

CWP-20: We believe that Forest Plan reserve tree/cavity-nesting habitat standards and guidelines are effective mitigation measures for providing cavity habitat.

CWP-21: Aerial surveys for mountain goats have been conducted for portions of the project area; the number of goats seen was recorded. A habitat model for mountain goat was run and areas with an HSI value greater than or equal to 0.80 were ground checked for goat use by Forest Service personnel. This is disclosed on page 3-47 of the DEIS under direct/indirect effects. Survey information, the goat resource report, and the wildlife resource report can be found in the project record.

CWP-22: The statement you are referring to on page 3-48 of the DEIS does not say “other species of concern.” It says “For the aforementioned species” (spotted frog, olive-sided flycatcher, Kittlitz’s murrelet, and moose) “there are no anticipated significant effects due to implementation of current Forest-wide standards and guidelines; therefore, these species are not included in the discussions below.” The remainder of the species listed in Table 3-11 is discussed in the text. The wildlife resource report discusses potential impacts to spotted frog, olive-sided flycatcher, Kittlitz’s murrelet, and moose. This report can be found in the project record.

CWP-23: The preferred alternative, Alternative 3, does not include any harvest by helicopter. Alternatives 2 and 4 do have a small number of units slated for helicopter logging. We agree that disturbance from helicopter logging should have been addressed under direct and indirect effects in the DEIS. This has been included in the FEIS. Unit cards have also been updated to include mitigation measures to protect nesting murrelets.

CWP-24: The lake would be separated from the proposed harvest Unit H24 by a no-harvest buffer of 100-feet of the lake margin or of the riparian area (typically one-site-potential tree height wide), whichever is greater. Refer to the mitigation section of the unit card for this unit in Appendix B.

CWP-25: We believe that the Forest Plan standards and guidelines provide adequate protection for wolves on the Tongass. As the DEIS states, the Forest Plan standards and guidelines were an important factor in avoiding listing the Alexander Archipelago Wolf.

CWP-26: The estimated deer habitat capability for Wildlife Analysis Areas 2305 and 2306 was 2,715 deer, or 21.5 deer per square mile (Table 3-16). This model output is not an actual population number, as you state, but it is a theoretical long-term carrying capacity for the

habitat in the area, and the values are useful for purposes of comparing potential effects on habitat capability to support wolves among timber harvest alternatives. Field studies completed in 2002 and deer harvest records indicate that relatively few deer use the project area (refer to the Wildlife and Subsistence sections of the EIS). We are not using the model to support the contention that deer populations are high. Rather, we are using it to demonstrate that there is little difference in the amount of habitat for deer provided under any alternative.

CWP-27: The impact of roads on wolves was discussed throughout the wolf section on pages 3-52 through 3-55. Wolves and their sign were documented along the existing road system and, therefore, it is apparent that they use the road system as a travel corridor. The Forest Plan recommends no more than 0.7 to 1.0 mile of open road per square mile. Table 3-19 breaks out the amount of road miles per square mile by VCU, which is the scale in which road density (miles/mile²) is calculated. The statement on pages 3-54 and 3-55 that says “increases in road densities for all action alternatives range from 0.0 to 0.2 miles/mile²” is based on the size of the VCU and existing and proposed roads under the various alternatives. However, based on the location of the proposed units in different VCUs, the total density of existing and proposed roads either remains at the existing road density (i.e., 0.5 miles/mile²), or slightly higher (0.6 miles/mile²).

CWP-28: The FEIS has been corrected to say that there are no other planned or expected timber sales in the foreseeable future. It is true that there may be additional sales at some time in the future, but no sales are known or planned at this time. Where and how timber can be harvested, as well as the amount of harvest per decade across the Forest, are issues that are decided in the Forest Plan. They are beyond the scope of this analysis. Also, please refer to CWP-7 for a response to your statement about the Homeshore units.

We do not agree that the cumulative effects discussion ignores the past harvest units. It explicitly discusses the cumulative loss of productive old growth (page 3-55 of the DEIS), the loss of wetlands (pages 3-56 and 3-148), the loss of wildlife corridors (page 3-57), the loss of beach fringe and eagle habitat (page 3-57), the effects on scenery (pages 3-101 through 3-104), and many other items.

CWP-29: Cumulative effects analyses involve considering the effects over time and space at wider scales than just the actual units so that the larger picture is considered. We believe that the project area is the appropriate scale for this analysis. Considering only a small area would defeat the purpose of this analysis.

CWP-30: Precommercial thinning is accomplished using funds appropriated for this purpose by Congress.

CWP-31: We do not agree that the analysis ignored the negative effects of roads on resources. For example, the cumulative loss of wetlands is discussed on pages 3-56 and 3-148 of the DEIS. The adverse effects of roads, both open and closed, on wildlife are discussed on page 3-58 and 3-59.

CWP-32: Your statement that more roads and logging will result in more landslides, erosion, loss of productive soil, and adverse changes to soil's physical characteristics is noted. We do not agree that the DEIS fails to analyze how roads and logging would affect landslides, erosion, loss of productive soil, and adverse changes to soil's physical characteristics. These issues are analyzed in the Soils and the Watershed and Fisheries Resource Reports and the analyses are summarized in Soils subsection (page 3-109 through 119 of the DEIS) and in the Watershed and Fisheries section (pages 3-121 through 141). Also, please see CWP-6 for our response to the windthrow/soil disturbance issue.

CWP-33: Actually, this statement in the DEIS is not correct. Nine of the 18 slides noted during field surveys are on slopes greater than 72 percent and 2 are on slopes that are nearly 72 percent (Figure 2-2 and Table 2-1 of the Soil Resource Report). This has been corrected in the FEIS to read one-half of the observed landslides occurred on slopes less than 72 percent. The DEIS notes on page 3-114 that 87 percent of the 140 landslides cataloged on the Tongass following a storm event were on MMI 3 soils. Table 3-46 shows that there are only 1.5 acres of MMI 3 and no MMI 4 soils in the proposed action (along the edge of Unit H32). Mitigation for soils requires that this area not be harvested (refer to the unit card for H32 in Appendix B of the DEIS). We believe that your statement that “This is a clear example of where Standards and Guidelines and BMPs cannot be expected to succeed” is not correct. There is clear evidence that removing areas greater than 72 percent slope and MMI 3 and 4 soils from harvest is an effective mitigation measure for avoiding landslides.

CWP-34: It is correct that not all adverse effects can be avoided, but they can be minimized to the point that sediment delivery to fish-bearing streams is not much greater than the levels delivered under unmanaged conditions.

CWP-35: We do not agree that the cumulative effects analysis for watersheds and fisheries is “clearly inadequate” or that the approach we used, adding acres harvested and roaded, is not appropriate. We see no evidence of why this is so, beyond the statement in the comment that it is inadequate. The example used in the comment, “the repetition of building a road, closing it, building it again, closing it, building it again, closing it, on and on, has more impact on water quality than doing it just once” fails to consider the time involved. The road is not built, closed, opened, closed, opened, on and on in the same short time period. It would be reopened once a decade at most, generally much less often. This allows ample time for systems to heal. Also, reopening a road is likely to result in much less sediment delivery to fish streams than initial construction because an existing roadbed is reused, thus requiring less soil to be disturbed.

CWP-36: We do not agree that the action alternatives would have unacceptable impacts to goshawks. Note that no goshawks have been sighted in the project area.

CWP-37: Additional information on moose hunting has been added to the FEIS.

CWP-38: Your support for Alternative 1 is noted. Alternative 1 would not meet the Purpose and Need for the project, as stated in Chapter 1 of the EIS. Alternative 1 would not manage the timber resource on suitable timber lands for production of saw timber and other wood products, it would not contribute to meeting the annual market demand for Tongass National Forest timber (including the needs of the local community), provide opportunities for resource uses that contribute to the local and regional economies, or support a wide range of natural-resource employment opportunities within Southeast Alaska.

Written Comment Sheet
Public Meeting for the Couverden Timber Sales DEIS

Ellie Sharman

RECEIVED

Thank you for your input.

MAR 22 2004

Date: 3/18/04

PLEASE PRINT:

Juneau Ranger District

I would like to state my support for Alternative #5. I feel it is extremely important for us to look for long term sustainability. Alternative #5 does just that. In addition this alternative will also benefit our local community and its' economy. Allowing a few small-scale local loggers to use timber in a way that does not change the character or the habitat of the Couverden area makes a lot of sense to me.

ES-1

I do not want to see these lands clear cut. Couverden is easily seen by visitors (our tourism dollars) and by Gustavus residents as we fly and travel by ferries, boats, & cruiseships. Clear cutting could impact our economy as visitors don't want to see it. Couverden is a critical viewshed - let's not waste it! The trees are far more valuable alive then they are cut down and shipped to

ES-2

****Continue on back for more space****

NAME: Ellie Sharman
ORGANIZATION:
E-MAIL ADDRESS:
MAILING ADDRESS/CITY/STATE/ZIP: Box 21, GUSTAVUS, AK 99826

Names and addresses will be added to the mailing list for the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

Comments may be mailed to:

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

Japan for a loss. The Forest Service has demonstrated that these kinds of large timber sales are not profitable - but rather a huge loss to tax payers. Please don't make the same mistake with Couverden. The wise choice is Alternative #5 - this should be the Forest Service's preferred alternative. Please re-consider your options.

Ellie Sharman

Response to Ellie Sharman

ES-1: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

ES-2: All alternatives meet the visual quality objectives for the area when viewed from the KVAs, which include the ferry routes (but not the airplane route as per Forest Plan direction). Refer to page 3-196 of the FEIS for the Forest Plan for a discussion of why airplane routes were not considered.

ES-3: Alternative 5 has a lower value (would lose more money under current market conditions) than the preferred alternative, which is a large sale.

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Clarence K. Stafforstad

Written Comment Sheet

Public Meeting for the Couverden Timber Sales DEIS

Thank you for your input.

Date: 03-17-04

PLEASE PRINT:

If you could take a good look at
sale # H32. This Valley is a
very good refuge for ^{black} bear, Deer,
and moose.
Before you log have a plan
to leave the road alone for future
future use for subsistence
Go to small scale logging

CKS-1

CKS-2

CKS-3

****Continue on back for more space****

NAME: <u>Clarence K Stafforstad</u>
ORGANIZATION: <u> </u>
E-MAIL ADDRESS: <u>Box 431</u>
MAILING ADDRESS/CITY/STATE/ZIP: <u>Hoonah AK 99829</u>

Names and addresses will be added to the mailing list for the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

Comments may be mailed to:

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

Response to Clarence K. Skaflestad

CKS-1: We agree, Unit H32 does provide good habitat for bear, deer, and moose.

CKS-2: The new roads are proposed for closure because they would be built under the silvicultural exemption from Section 404 of the Clean Water Act. The Corps' comments on the DEIS state that "the forest road exemption applies only to roads that would be used solely for normal silvicultural activities, such as the harvest of trees. Forest roads that would remain open and that would provide more than incidental use for subsistence or recreational access, or other public use..." would not be exempt from Section 404 requirements.

CKS-3: Your recommendation that we "go with small scale logging" is noted.

Faggen skaflestad

Date: 03-17-04

Look at H32 Sale not a good
one to log.

Don't Pull out Roads when done.

FS-1

FS-2

NAME: Laggon Shafter
ORGANIZATION: _____
E-MAIL ADDRESS: _____
MAILING ADDRESS/CITY/STATE/ZIP: HOOVER AL AK 99829

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Comments may be faxed to: (907) 586-8808

Response to Faggen Skaflestad

FS-1: Your recommendation that Unit H32 not be logged is noted.

FS-2: The roads are proposed for closure because they would be built under the silvicultural exemption from Section 404 of the Clean Water Act. The Corps' comments on the DEIS state that "the forest road exemption applies only to roads that would be used solely for normal silvicultural activities, such as the harvest of trees. Forest roads that would remain open and that would provide more than incidental use for use for subsistence or recreational access, or other public use..." would not be exempt from Section 404 requirements.

MAR 16 2004

Greg Strevler

Juneau Ranger
District

Gustavus Community Association

Post Office Box 62
Gustavus, Alaska 99826

Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

March 12, 2004

Re: Couverden Timber Sales Comments

The Gustavus Community Association (GCA) appreciates the opportunity to comment on the Couverden timber sale DEIS. Many Gustavus residents are all too familiar with the last Couverden timber sale. During 1984-85, the Forest Service (F.S.) put in almost 30 miles of road and 8 bridges at Couverden, spending 5.5 million dollars of taxpayer's money. The sale then drew no bidders. When the F.S. finally found a buyer, the price was reduced to base rates and garnered a mere \$113,000 (barely 2%). Unfortunately, the current proposed alternative (alternative 3) is doomed to the same fate.

The current market for Tongass timber is virtually non-existent, far worse than during the last sale. Even in your own DEIS (p.2-12) you admit, "none of the proposed alternatives are economically viable under current market conditions." To make this sale (which is predominantly small, low-grade hemlock) even remotely attractive to a bidder, the F.S. will likely sell at base rates and offer an round log export permit, guaranteeing the continued loss of millions of taxpayer's money with little, if any, benefit to the local economy. Therefore, GCA cannot support alternative 3.

For well over a decade, GCA has supported increased protection for the Tongass from clearcut logging, as well as supported inclusion of the Tongass in the Roadless rule. GCA has also consistently supported a truly sustainable, value-added wood products industry from the existing road system. Alternative 5 in the DEIS is in fact modeled after a plan worked up by Gustavus residents, although the Gustavus plan suggested harvesting in perpetuity. The F.S. alternative omits this concept. We urge the F.S. to revise alternative 5 to include the "in perpetuity" concept and accept it as your preferred alternative.

It has also come to our attention that, under a new F.S. policy, the F.S. will no longer hold hearings in regards to any action occurring in Alaska (except for subsistence hearings required by law under ANILCA). We strongly oppose this change in policy. The Tongass is public land and Gustavus residents are heavily dependant on the Tongass for business, subsistence and recreation. We oppose substitution of the open house concept, and request that a formal hearing on the proposed timber sale be held concurrently with your planned subsistence hearing on March 18.

Thank you for this opportunity to comment on this important issue.

Sincerely,

Greg Strevler
Chairman

GCA-1

GCA-2

GCA-3

GCA-4

Response to Greg Streveler, Gustavus Community Association

GS-1: Your comments on a past timber sale are noted.

GS-2: Timber would only be sold if timber values were to rise to the point that the sale would be economical, as noted in the EIS.

GS-3: Your long-term support for a value-added timber industry and opposition to clearcut logging is noted. Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

GS-4: The Forest has not changed its public involvement process for timber sale EISs. Holding formal hearings has not been a requirement. Public meetings can follow, and have followed, in various formats. For example, informal information workshops, allowing members of the public to ask specific questions and gather general information about the project, were held for the Madan and Skipping Cow EISs several years ago. Formal hearings were held in Hoonah and Gustavus for subsistence, as is required under ANILCA.

Eric Syrene

Written Comment Sheet
Public Meeting for the Couverden Timber Sales DEIS

Thank you for your input.

Date: 3-18-2004

PLEASE PRINT:

Seems to me Subsistence issues here are short sighted and narrow.
The Draft EIS speaks of little relative subsistence use ~~for~~ by surrounding communities in terms of hunting, trapping & fishing on the land presently and in recent history. It speaks of project goals in short sighted terms considering the natural history and processes. (Growth Rate of trees & Forest Habitat Maturity). These are very important issues. Subsistence in broader relative terms concerning Anstavus as a local community must take into consideration the SocioEconomic realities. There are established ways of life in people communities & natural communities. In Anstavus ("Gateway to Glacier Bay National Park") tourism, commercial fishing, Logging/Milling, Sport/Charter Fish & hunt are pretty small scale and the view is generally toward sustainability - Sustaining the people and their values for generations - In perpetuity. The natural way of life that surrounds

ES-1

****Continue on back for more space****

NAME: <u>ERIC SYRENE</u>
ORGANIZATION: _____
E-MAIL ADDRESS: _____
MAILING ADDRESS/CITY/STATE/ZIP: <u>P.O. 251 Anstavus, AK 99826</u>

Names and addresses will be added to the mailing list for the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

Comments may be mailed to:

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

teaches us the values. Alternative 5 is the choice that makes most sense for the region and local communities. It meets the goals of long term even flow production beyond what any other choice does

ES-2

Selective patch cutting processes gives most consideration for watershed, (especially considering overflight between Juneau/Austaus) Tourism, charter fish hunt. Also maintaining the most viable biodiversity.

All other alternatives compromise sustainability & diversity as well disrespect the local realities.

ES-3

Locally we need a timber supply, Couverden is the logical choice. Alternative 5 meets the needs and promotes the local industry to grow providing jobs & supporting economic growth in a sustainable manner. Its quite unfortunate that Alt. 5

ES-4

ES-5

was under represented in the Draft FEIS.

The economics of the sales at this time is just not profitable though Alt 5 seems most feasible for the local community & strives to meet all issues respectfully. Small sales affordable to local small operators, no new roads, no clearcuts, minimal impacts to wildlife & subsistence use & scenery. The preferred alternative

#3 seems so far out of line with the issues & Forest Plan Goals & Objectives. Sustained even flow long term yield in an economically efficient manner. Supply that meets annual market demand/planning cycle. Diversity of opportunities for resource uses that contribute to the local & regional economies of SE Alaska. Support a wide range of natural resource employment opps within local communities. Thanks for your time & consideration Eric Syre

Response to Eric Syrene

ES-1: The subsistence issues included in the FEIS are based on Forest Plan direction, scoping comments, interviews with local subsistence users, and input from the subsistence hearings held in Hoonah and Gustavus. Refer to the transcripts of these hearings in this appendix and to the Subsistence section in Chapter 3. These transcripts are included at the end of this section.

ES-2: Your support of Alternative 5 is noted.

ES-3: We do not agree that all other alternatives than Alternative 5 compromise sustainability. All alternatives are sustainable; refer to the Cumulative Effects subsection of Issue 4 in Chapter 3 of the FEIS. Please refer to the response to NB-9.

ES-4: Your comment that Alternative 5 meets local needs in a sustainable manner is noted. All action alternatives are capable of meeting local needs for wood and all alternatives are sustainable. Refer to our response to NB-6 for a discussion on sustainability.

ES-5: We do not agree that Alternative 5 was under represented in the DEIS. Alternative 5 was given as much attention as the other action alternatives.

ES-6: Your comments on the economics and feasibility of Alternative 5, and the minimum impacts that it would have to wildlife, subsistence, and scenery are noted.

ES-7: Your statement that the preferred alternative is out of line with the Forest goals and objectives is not correct. Refer to the discussion in Chapter 2.

Todd Thingvall

From Todd Thingvall <thai@gci.net>
Sent Friday, February 13, 2004 7:47 am
To thai@gci.net
Cc
Bcc
Subject

RECEIVED

FEB 13 2004

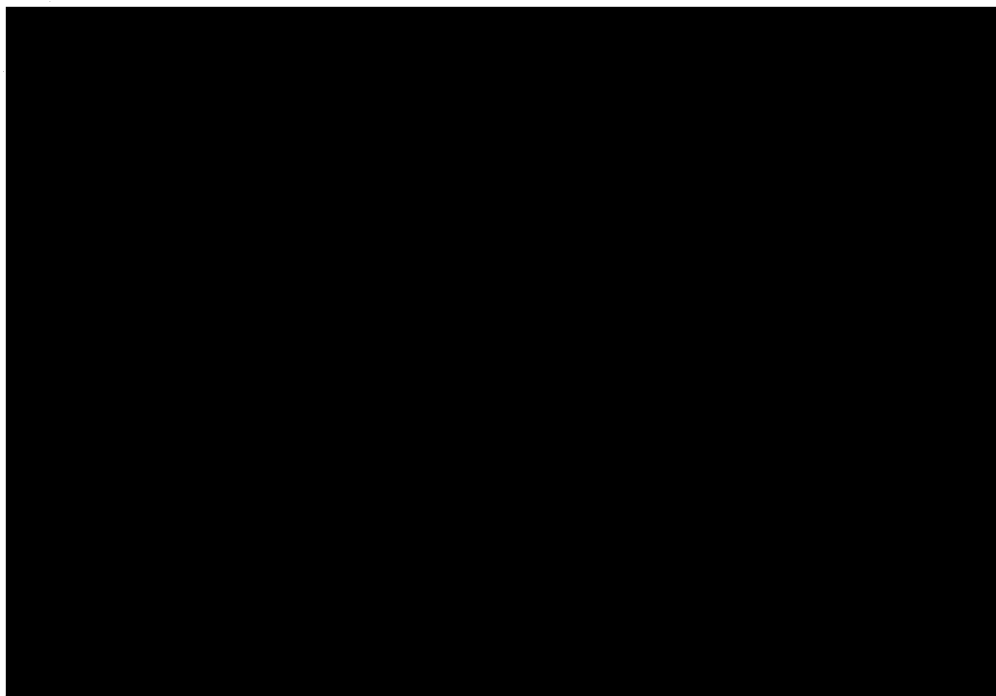
Juneau Ranger
District

To whom it may concern;

Thankyou for sending me a copy of the Couverden EIS.

I own property within the project boundry, and have some information that you may be able to use in your scoping process.

On Heritage Resources:



TT-1

<https://ems-1.gci.net/frame.html?rtfPossible=true&lang=en>

2/13/04

On Key Viewing Areas:

On page 3-87 of the EIS you state "KVA 5 is a private recreation residence along the southern coast". Actually, it's two private recreation residences. One of which is owned by myself. The other belongs to Dr. Mark McCaughen.

I am in the process of developing my property into a lodge. The thought of clearcuts in the background sickens me. My wife and I are investing our life savings in this lodge. We had planned to market it as an ecotourism business, under the name Vall Cabin. Check the list of licensed state businesses.

Between KVA 5 and KVA 6 are two more cabins. One is owned by David Pijan. I don't know the name of the other owner.

Please consider these issues in your decision. Our future is in your hands.

Todd Thingvall
Todd Thingvall
8205 Cedar Drive
Juneau, AK 99801
(907)-789-1929

TT-1
cont

TT-2

TT-3

Response to Todd Thingvall

TT-1: Thank you for the additional information on cabins and the information on heritage sites in the project area. The heritage information is confidential and is not being released as per the National Historic Preservation Act and the Archaeological Resources Protection Act because including this information in a public document could jeopardize these sites. Therefore the portion of your letter describing these sites and their locations has been blacked out and the map has not been included.

TT-2: Your intention to develop your property into a lodge and your dislike of clearcuts in your area are noted. None of the proposed units under Alternatives 2, 4, 5, and 6 would be visible from KVA 5 (your property) and only 4 acres would be visible under Alternative 3 (refer to Table 3-39 of the DEIS).

TT-3: Thank you for the information about the two cabins between KVA 5 and KVA 6. This information has been added to the FEIS.

Couverden Timber Sale Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801-8041

Please accept the following as my comments on the Draft EIS for the
Couverden Timber Sale.

Recommend Alternative 2 be selected as the action alternative as it
provides the most benefits to the Forest, to the local community, and to
the state.

RT-1

Rachel Thomas
2136 N. Truman Road
Huachuca City, AZ 85616

Response to Rachel Thomas

RT-1: Your support for Alternative 2 is noted. Alternative 2 would respond to the Purpose and Need (refer to Chapter 1). It would not respond to Issue 1, avoiding road construction and timber harvest in roadless areas as well as the other alternatives. It is similar to Alternative 3, the preferred alternative, in most aspects; however, because it includes helicopter yarding it is less economical. Please refer to the Comparison of Alternatives section in Chapter 2 for a discussion of how the alternatives respond to the issues.

Michael W. Tobin

RECEIVED
MAR 29 2004
JUNEAU DISTRICT

Michael W. Tobin
PO Box 33578
Juneau, AK 99803
March 27, 2004

To: Juneau Ranger District
Re: Point Couverden Timber Sale

I am writing in support of Alternative 5 in the draft EIS. This alternative would provide production for truly local use of the resource, provide local jobs, have the least impact on wildlife and habitat, and would be an example of respectful, sustainable resource use. It also has relatively low cost to the taxpayer. It could be a model for forest management in an era of low market demand for Tongass timber when SE communities are still importing finished lumber from the lower 48.

MT-1

Sincerely,

Michael W. Tobin

Michael W. Tobin

RECEIVED

MAR 29 2004

Response to Michael Tobin

MT-1: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

William R. Tonsgard

CHANNEL CONSTRUCTION, INC.

March 26, 2004

USDA
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RECEIVED

MAR 30 2004

Juneau Ranger
District

RE: Couverdon Timber Sale


This letter is in support of the Couverdon Timber Sale proceeding to the bid process. The sale area already has a road system, log yards, an LTF, and camp service facilities. The timber from this sale is sorely needed by Icy Straights Lumber and Viking Lumber along with other numerous smaller mills. This sale would generate much needed income to the residents in both Hoonah and Juneau, as well as provide barging services to an area where those services aren't readily available.

WRT-1

The Forest Service's mission is to manage our forest for "multiple use". Currently our forests are largely recreation and its time to balance the uses.

WRT-2

Sincerely,


William R. Tonsgard
President

P.O. Box 33359 JUNEAU, ALASKA 99803-3359 (907) 789-0200 PHONE (907) 789-5248 FAX

Response to William R. Tonsgard

WRT-1: Your support for selling timber to provide income for residents of Hoonah and Juneau is noted.

WRT- 2: Your support for multiple use management of the Forest is noted.

Couverden Timber Sale Comments
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK99801-8041

I do not support the Forest Service's Couverden Timber Sale Preferred Alternative. I support Alternative 5. Alternative 5 is a variation of the citizens of Gustavus proposed alternative. This alternative makes more economical and environmental sense. Alternative 5 could keep small-scale local loggers supported indefinitely while maintaining the character and habitat values of the Couverden area.

MFT-1

The Forest Service preferred alternative is too big and expensive. On February 23, 2004, Juneau's radio station KTOO, broadcast a story with spokespeople for Silver Bay Logging Inc., and the Seley Family Partnership, two of the major mill operations on the Tongass. These representatives said that it wasn't likely that they would purchase the sale because the Couverden area is too far from their mills and the value of the timber is low. Another smaller operator in Hoonah has said that the sale was too big for him to consider. In the Draft Environmental Impact Statement the Forest Service states, "none of the proposed alternatives would be economically viable under current market conditions" (DEIS 2-12). If "none of the proposed alternatives would be economically viable under current market conditions" why proceed with timber sale planning?

MFT-2

MFT-3

Point Couverden is in a critical viewshed, easily seen by passengers aboard cruise-ships, ferries and other vessels traveling Icy Straits. Air travelers flying between Juneau and Gustavus also look down on Point Couverden. The Forest Service estimates that 313 acres of logged land would be visible from key viewing areas under the preferred alternative. This could have negative impacts on the areas growing tourist industry.

MFT-4

Residents and visitors use the Point Couverden area for salt and fresh-water fishing, hunting for moose, mountain goats and black bears. The area is also popular with boaters, kayakers, hikers and beachcombers. Nearby bays and coves serve as popular anchorages for commercial and recreational boats. Logging could inhibit these uses and displace existing business such as outfitter-guides who use the area for black bear hunting.

MFT-5

The Forest Service's preferred alternative would also threaten the cultural and historic resources in the area. The people of Hoonah have traditionally used all of the Icy Straits area including Point Couverden and Homeshore.

MFT-6

Michael F. Turek
4443 Mountainside Drive
Juneau, Alaska 99801

Response to Michael F. Turek

MFT-1: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

MFT-2: Timber would not be sold unless timber prices rise to the point that the sale is economical. The total volume under consideration in the Preferred Alternative would not necessarily be offered in one sale. One or more smaller sales could be offered.

MFT-3: Please see Appendix A for an explanation of why this sale is being planned.

MFT-4: Between 0 and 5 acres of the proposed clearcuts under Alternative 3 (the preferred alternative) would be visible from any of the KVAs, except KVA 4 (refer to Tables 3-36 to 3-41 in the DEIS). Portions of 13 units with a clearcut with reserves prescription (totaling approximately 171 acres) would be visible from KVA 4. Concentrating reserve trees in the visible portions of these units would mitigate this. Refer to Figures 3-15 and 3-17 for photos of the current view from KVA 4 and the projected view after harvest as proposed under Alternative 3. It is correct that air travelers that pass over the project area would see additional acres of harvested land.

MFT-5: Logging is likely to inhibit uses associated with road use and access via the LTF for periods of time, depending on the size and number of sales. However, much of the area will not be affected by the proposal. We do not expect that the project would inhibit boaters and kayakers as you suggest.

MFT-6: We do not agree that the preferred alternative would threaten the cultural and historic resources in the area. Please refer to the sections on heritage resources, recreation, and subsistence resources for a discussion of the effects of the proposed alternatives.

Hello,

I am a concerned Alaskan who was raised in Juneau. I have commercial fished in Icy Strait and Excursion Inlet and have spent much time on land at Pt. Couverdon. Having just completed an Alaska History class at UAA, I have learned much about the economical loss we have suffered due to logging the Tongass National Forest. Monopolies and pollution thanks to the pulp mills is another topic, what I'm concerned about is the destruction of more forest at little profit. I flew over Couverdon last August and was disgusted with all the visible clear cut that already exists. More damage will threaten subsistence practices, salmon streams, and deface more of our forest which will have only negative affects for the present and the future when the dense, uninhabitable second growth arrives. Have we not learned from logging history of Southeast AK and the Oregon and Washington forests? After the money is gone so is the forest. And as for keeping loggers employed, well they have forced everyone else to yield to their lifestyle and live with clearcuts. Maybe now it is time for them to live without any more clearcuts and obtain labor skills more beneficial to the future of our resources.

JU-1

I strongly reject the sale of Couverdon lumber and support SEACC's alternative proposal for the Couverdon lumber sale.

JU-2

Thank you for your time,

John Unzicker

Response to John Unzicker

JU-1: We do not agree that the proposed harvest will threaten salmon streams or subsistence practices. Please refer to the Watershed and Fisheries and the Subsistence sections of the EIS for an analysis of the potential effects on these resources.

JU-2: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

As a Couverden Area property owner, I am distressed to learn of the possibility of future timber sales in that area of northern Southeast. From everything I have heard, the timber volume and quality in that area makes this a marginal prospect at best. Furthermore, this area is an important viewshed for all the summer tourist traffic to Glacier Bay that travels by ship.

RHW-1

RHW-2

Given the nearly moribund state of the lumber mills in Southeast, I just don't see future logging in this area as having any meaningful impact economically and some detrimental effects to the existing growth industry of the area, namely tourism.

RHW-3

Please keep this area off the table as far as future timber sales.
Sincerely,

Randall H. Wiest
POB 1489, Homer, AK 99603
(property owner, USS 707, Haines Borough)

Response to Randall H. Wiest

RHW-1: Timber would not be sold unless timber values rise to the point where the sale would be economical.

RHW-2: We agree that the Couverden area is an important viewshed for summer tourist traffic to Glacier Bay. The Couverden Scenery Resource Report documents the extensive analysis of the viewshed and the potential effects for the proposed alternatives upon that viewshed prepared for this proposal. This analysis is summarized in the Scenery section of the EIS. Very little of the proposed harvest would be visible from the sea lane.

RHW-3: Your comments about the current state of lumber mills and the effects of the project on the industry and on tourism are noted.

Juneau Ranger District

I would like to express my opposition to the Couverden Timber Sale that is being purposed on a large scale. I feel that it is an area that is very important to hunters and fishermen and that logging would displace these activities. I also understand that the local use of the area for timber is being rejected, i.e. where people in Gustavus could run a small scale business with the local timber at Couverden but this alternative is not being considered. I strongly believe that we can allow local timber sales on a small scale for commercial purposes and that it should not be given away as a subsidized timber sale to large corporations. Timber harvesting should be done when economically feasible and with as little impact as possible so all user groups, including the wildlife that exists there benefits.

EW-1

EW-2

Couverden is an important site historically for the people of Hoonah and Icy Straits. It is an important viewing area seen by many vessels that carry tourists up Icy Straits, and lastly it is not worth spending millions of taxpayers dollars on roads that for timber that is not worth the price..not getting a price that will pay for the harvesting. We should not subsidize timber harvesting for the sake of a few jobs that aren't even local jobs. I would like the Forest Service to stand up to our Federal Govt. and tell them we are no longer going to trash our public land for a high cost by taxpayers for only a few jobs...where the wood gets shipped overseas and sadly turned into pulp at a loss. At a time when we are in a huge deficit..we should not be allowing any timber sales that can not be done economically. I support using our forest for value added products when profitable by local businesses that hire local people and support our local communities.

EW-3

EW-4

Thank you for this comment period.

Sincerely
Elizabeth Wilson
PO Box 538
Haines, AK
99827

Response to Elizabeth Wilson

EW-1: Your opposition to the proposed sale is noted.

EW-2: Your statement that Alternative 5 is not being considered is incorrect. It is one of the six alternatives considered in detail in the EIS.

EW-3: We agree that the Couverden area is important historically and that it is an important viewing area seen by people on many vessels traveling through Icy Strait. Refer to the Heritage section of Chapter 3 for the effects on heritage resources and mitigation measures associated with each proposed alternative. Refer to Issue 5, Scenery, for the effects on scenery and mitigation measures associated with each proposed alternative. Note the visual simulations for each alternative in that section.

EW-4: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

To the U.S. Forest Service:

We request that you further develop the Couverden DEIS Alternative #5, with input from potential local resource users and other area residents. The adoption of this alternative is the only economically viable and environmentally responsible option for the proposed Couverden timber sale.

KJHW-1

We are tired of the waste of OUR tax dollars building roads, only to clear-cut the forest and sell the logs at a further loss. By adopting Alternative #5, these loss-generated logging industry jobs could be replaced with jobs that not only bring income to families, but also supply a value-added product for Alaskans. Alternative #5 would not only supply jobs and a value-added local product, but would also protect the viewshed and habitat for future generations.

KJHW-2

Thank you for your consideration.

Sincerely,

Karen, Jeff and Hannah Wilson

175 S. Franklin, Suite 300
Juneau, AK 99801

(907) 463-3520

cc: Sen. Lisa Murkowski
Sen. Ted Stevens
Rep. Don Young

Response to Karen, Jeff, and Hannah Wilson

KJHW-1: Your comment that Alternative 5 should be developed further is noted. Forest staff have met with the local community to discuss meeting the needs of the local community for wood.

KJHW-2: Your comment about wasting tax dollars and your support for Alternative 5 are noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

To: Comments-alaska-tongass-juneau@fs.fed.us
attention Dave Carr

Comments on Proposed Couverden Timber Sale.
by Robert E. Wolf,
Fellow, Society of American Foresters.

Tongass Overview

The DEIS says that the Tongass is 80% of the land in S.E. AK. This glosses over the fact that much of the Tongass has no forest and is "rocks and ice".

The Tongass, however, is the largest Forest in the NFS System. On the other hand, it's one of the smallest in land with marketable size timber. A far lesser proportion of the Tongass is timbered than most National Forests.

In 1980 it had about 17,712,000 acres of which 2,036,000 acres, 11.5% was rated "Suitable for Timber Production". By 2004, Tongass had dropped to 16,600,000 total acres as a result of the selection of prime timber lands by Alaska Natives under ANILCA. Its current Forest Plan rates only 676,000 acres "Suitable", just 4% of the Forest. It is important to realize that neither the term "Commercial Forest Land" (CFL) or "Suitable for Timber Production" are based on an analysis that shows the timber would be profitable to manage on a sustained-yield basis by either the land owner or a timber buyer.

REW-1

CFL timber is on the numerous islands that make the Tongass a unique rain forest, as well as on its lowland peninsulas. This is why the current 676,000 acres in its "CFL-Suitable" category are fragmented and disconnected.

Further the Tongass, because of its islandic-peninsular structure has an isolated type road system tied only to past timber sales on that island, rather than one that connects all parts of the Forest and can serve various uses. The Tongass has 3,566 miles of roads; only 4 miles are paved. Therefore it is not available for the heavier recreational-hunting use common on other National Forests.

Road data is only available from 1992-1998 in TSPIRS. The Tongass has 6,560 miles of road; just 4 miles paved. Its roads aren't interconnected linkage with communities, but are primarily roads from sale area to a water log dump.

For 1992-1998 the Tongass built 794 new miles of timber roads, while rebuilding 584 miles, for a total of 1,387 miles. Rebuilding roads became more prevalent. In 1992 0.3 of mile was rebuilt for each new mile; by 1998 the ratio was 7.4 miles were rebuilt for each new mile built. In addition to the ample appropriated funds used to build roads and engineer roads built by purchasers, \$82,380,000 in timber at going stumpage rates, was given purchasers for road building. (see Att. roadtong.wk3)

Large timber National Forests in the Pacific Northwest, such as the Willamette, which has 26% of its land rated "suitable" are in blocked up holdings. It's ASQ was 491 MMBF before Owl restrictions. Now the ASQ is 136 MMBF compared with 187 MMBF for the Tongass. The Willamette, for example, typically recovers its cost to sell timber. The Tongass has never succeeded in doing so.

The Allegheny in PA has 513,000 acres with 88% rated "Suitable". It's a consistent profit Forest, averaging +\$1,093/acre for the past 12 years. Cost recovery happens when the timber has the right value and costs are within bounds.

Never in the past 23 years, 1981-2003, have Tongass timber receipts recovered costs. The costs have been \$230,000,000 in timber revenue foregone to build logging roads, reforest and do salvage, \$72,000,000 in county payments, \$400,000,000 from the TTS Fund a decade long appropriation for timber road building, plus \$670,000,000 in appropriated money to prepare and administer sales. This is total expenditure of at least \$1.371 billion, with not one cent of profit in sight. These costs, less receipts from sales show a conservatively estimated losses of -\$965 million cutting 5.77 billion board feet. This loss condition has persisted for the entire past 60 years when 2 prior unsold large long-term sales were reactivated. 50 year timber losses far exceed \$1.3 billion with no end of losses in sight.

REW-1
Cont.

Conclusion

With 138,000,000 BF in 20 contracts getting "no cost" cancellations due to Sen. Stevens amendment to the '04 appropriation Act, there's no logical reason to proceed now with the proposed 20,000,000 BF Couverdon sales.

The persistence and extent of losses selling Tongass timber argues for re-assessing the soundness of all sales. However, given the realities

facing Tongass management, at a minimum a policy of "best environmental outcome-least loss" should be the guide that it used.

How Recent Events Shaped Posture.

Sen. Stevens rider on the '04 appropriation act directs the Forest Service to cancel up to 70 Tongass timber contracts awarded between Oct. 1, 1995 and Jan. 1, 2002, 6.25 fiscal years, if the Secretary finds:

- [a] Completion would result in purchaser financial loss, and
- [b] the cost to seek legal remedies will exceed the cost of terminating the contract.

The 2 unique standards assure that the timber firms can have almost any of the 70 contracts canceled, while the Tongass can't cancel a single contract because it is losing money.

Then the rider permits all 20 (or 70) sales to be reoffered, also with no requirement that the Tongass limit its losses.

By Feb. 2004, 20 contracts with 138,000,000 BF were canceled. If the other 50 contracts are canceled, this would eliminate most of the Tongass timber still under contract.

If only the 20 sales with 138,000,000 BF in previously sold volume is all that's returned this timber is now available to reoffer. There is now no logical basis to proceed with the 20,000,000 BF Couverden Timber Sale, especially since its field work and pricing has not been completed. If "new" sales are desired, the Tongass now has "ready to go" over 6 times the Couverden preferred volume. This volume can be reoffered with relatively little reworking. Failure to promptly re-work and re-offer these returned sales means that all the money and time getting them under contract in the first place will have been wasted. To proceed with both the 20 MMBF Couverden sale and the reoffer of all or part of the 138 MMBF just returned, will glut the already woefully weak Tongass market, and produce more sale rejection.

Sale rejection by Industry has been a major Tongass problem, averaging 17% of the volume offered for 1987-1994; rising to 46% of the volume offered for 1995-2002. Then in 2003 only 36.5 MMBF was sold with

REW-2

59% of the 88.9 MMBF offered being rejected by Industry. This is a sign of insignificant demand for Tongass timber, even at the bargain \$39.17/MBF bid in 2003 (PRC is excluded). This timber when cut will cause the Tongass to lose around -\$5,000/acre cut, an outcome that should give sale proponents pause.

REW-2
Cont.

Since the Tongass loses huge sums of money on every sale, the goal, if any timber is to be offered in new sales or resold, should be to restrain losses. The priority should be reoffering only so much of the 138 MMBF in the 20 canceled sales as is reasonable on the current market using a standard holds down F.S. losses, while fulfilling Forest environmental goals.

The Proposed Couverden Timber Sale.

The 620 page EIS is on a CD ROM. It's useful, but too large to fit on a floppy; has such fine print that on screen its difficult to read and involves a formidable printing task. EIS CD-ROMS should be designed so that essential text can be run on a 3.5" floppy without maps if the user desires.

REW-3

The Couverden sale's preferred alternative proposes to log 2,809 acres to cut 20 million BF, an estimated average yield of 7,120 BF/acre. This is far less than the 33,000 BF per acre usually cut.

REW-4

Tongass sales with over 1 MMBF have been averaging 1,250 MMBF in size. The average bid price in 2002 was only \$24.30/MBF (PRC excluded). If mills can't make it paying this low price for stumpage, Couverdon sales won't help them stay in business. It's not clear from the text whether Couverden is to be one sale or several sales. A 20 MMBF sale isn't large enough to attract a new mill. If a single sale is planned a sale this size is well beyond what buyers are seeking. For example, the 20 returned sales calculate out at an average size of 6,900 MBF.

REW-5

There is nothing in the DEIS on contract length, estimated gross receipts, receipts to be consumed by PRC, KV, Brush Disposal and Road Maintenance Coop Deposits, and the Salvage Fund, and the net that will be left. There's not an experience stated picture of the appropriated funds that will be used for Sale Preparation and Administration costs plus the timber R.O. and W.O overhead. There isn't even a tabulation of planning and DEIS costs to date. However, this 620 page DEIS is evidence that a lot of money has already been spent to get to this stage.

REW-6

The ASR 13 statement of receipts, other financial facts and forest information available provide a credible 12 year cash flow account and other pertinent information.

On the Tongass the past is prologue. Three critical conditions assure any sale offered will cause the Tongass to lose a large sums of money.

1. For the 12 years, 1992-2003, putting the best face on timber sale cash flow by omitting county payments, the

Tongass increased it's perpetual timber sale cash flow loss. The 12 year record is a loss of -\$315,444,000; a net loss of -\$4,929/acre logging 58,635 acres or a \$147.00/MBF loss cutting 1,964,049 MBF.
(see Tong12yr.wk3)

The loss in 1992 was -\$3,934/acre; in 2003 the loss catapulted to \$32,556/acre cut. The 2003 loss may not be the exact amount calculated because the Sale Prep/Admin and R.O./W.O. costs had to be estimated. Still the loss exceeds \$30,000/acre.

REW-7

Rising gross timber receipts doesn't mean that sales may recover costs. This is because so much of the receipts are consumed by tasks necessitated by making the sale; such as KV, PRC, Salvage, BD & Road Coop. Deposits.

The ASR based price paid for Tongass cut differs from the "cut" price in the cut and sold report. I have used the more comprehensive ASR dollars + BD and RM Coop deposits to define the price of timber cut. This price of timber cut has fallen as well as fluctuated widely (as have the Cut/Sold prices). The price peaked in 1994-1996 (\$188.10 in '96), then fell sharply (\$56.99 in '00) rising to \$92.18 in 2003.

K.V., PRC, Salvage, BD & Road Coop. Deposits consumed 83% of receipts for the 12 years, and 114% for the 8 years, 1997-2002. There never was enough left to cover sale prep/admin costs, R.O. & W.O. timber overhead. Of course, there wasn't enough left to cover 25% costs.

2. The Drop In Volume Bought Is "Weak Market" Sign.

The reduction in timber offered has not produced the purchase of a higher percentage of it by timber firms. Rather, the Tongass percent of volume rejected by Industry has climbed

Tonghist.wk3 (attached) shows the substantial decline in the volume sold and cut since 1983. The last 9 years are relevant and notable. For 2000-2003 the volume sold fell to 45% of the 1995-1999 level and the cut fell to 31% of the prior period.

Timber sale volume and gross receipts estimates are poor. For the 9 years, 1995-2003 the volume cut was 46% greater than the volume sold, but the price was -7% less per MBF. Part of this may be due to the lag between when timber is sold versus cut. However, the divergence between volume and per MBF price appears to be the result of weak estimates of volume and value.

Even if the Forest isn't concerned about its monetary losses, the sale results performance are discouraging. There's a need to evaluate how well the Forest controls sale performance.

REW-8

2. Industry has rejected major amounts of the volume the Tongass offered, see "Tongass.wk3".

For the 8 years, 1995-2003 Tongass Offered 1.277 billion BF. Industry rejected 596 million BF. Industry bought only 681 million BF. Industry rejected 40% of the volume offered.

Most telling is that in 2003 Industry rejected 51% of the 88.9 MMBF Offered buying only 36.4 MMBF. This high rate of sale rejection forces up Sale Prep costs because of the wasted work. The Tongass must prepare 2 MMBF to sell 1 MMBF. This level of sale inefficiency should be a cause for reform.

3. The Sen. Stevens proviso in the 2004 Appropriation

bill permitted cancellation of up to 70 existing timber sales, whether partially cut or not, awarded between Oct. 1, 1995 and Jan. 1, 2002. This nullifies the need for the Couverden sale.

These 3 elements suggest that Tongass timber sales are so financially costly for the Forest Service, and so often rejected by Industry, that whatever adverse ecological impacts some analysts may cite, these will pale in significance when compared to the poor sale performance and the F.S. financial loss.

Understanding How The National Forests Came to Exist Shows Why Money-losing Timber Sales Pervade And Persist Especially On The Tongass.

Trees, like ideas, have deep roots. Tree growth is conditioned by the site. Idea growth is conditioned by the soundness of its premises.

In 1898 Charles Walcott, Dir. U.S. Geological Survey wasn't the first to advance the claim that public forests are profitable. He, however, detailed his basis for this claim while fulfilling his obligation, as required by the 1897 Act, to report to Congress whether the U. S. Forest Reserves, which Pres. Cleveland had added, should continue. He opted that they should not be abolished. In doing so strengthened and gave gravity to the public forest "profitability" myth.

His section on "COST AND PROFIT OF FOREST RESERVES", promoted the myth that public forestry would be universally profitable for the Government. He based his position by contending that proof of the value of Government forests was confirmed by the results in other countries:

Prussian forests had a \$6,000,000 net revenue.

France and Algiers netted \$2,700,000.

The net revenue of the British India forests was \$3,000,000.

Walcott opined that India's climate and silvicultural conditions are similar to those in our reserves and public lands, thus concluding that U. S. forest reserves would be profitable.

REW-8
Cont.

A positive financial outcome could have been likely if National Forest land had been carefully selected from public domain lands using criteria based on their potential for profitable operation by the Government for forestry, grazing, etc. Alas. this wasn't the standard.

During the 1896 whirlwind trip West by the Sargent Commission in search of new Reserve candidates the members made only cursory examinations of potential lands.

Pinchot says he picked one in Montana because of "...its fitness for prompt and paying forest management." [Breaking New Ground @ 96]. However, on the ground studies were never made.

All 9 Montana N.F.'s lose money on their timber sales; loss -\$468 million for the 12 years 1992-2003; a loss of -\$1,916 per acre logging 244,094 acres. Grazing fees, at \$1.35/AUM are at a tiny fraction of F.S. costs. These losses, so persistent and large, can't be blamed on citizen appeals, agency inefficiency, etc. Most of their timberlands simply aren't amenable to profit to the F.S. for sustained-yield forestry or break-even grazing.

Pinchot, as the first Forest Service Chief, exuded uninhibited confidence that National Forest operations would be profitable. In 1907 Pinchot reminded the Appropriations Committee that he had promised key members of Congress in 1905, when the Transfer act he sought was being revived for a second vote, that if he could keep receipts and receive \$1,000,000 yearly in appropriations that by 1910 National Forest receipts would cover all agency costs. [59 Cong. 2nd Sess. House Agric.Com. Hng. on Exp. 1907 p 791],¹.

REW-8
Cont.

¹The first Transfer bill was submitted in 1902 by TR with a companion bill to create the Bur. of Reclamation. It sailed through. Cong. Mondell (R WY) and Cannon (R IL), who chaired the Com. on Appropriations had the Forest Reserve bill recommitted. This was a real slap at a President of their own part. Then TR won a second term. He now was President in his own right. TR had GP get to work, persuading

Pinchot also assured Congress;

"We recommend no cutting that does not pay for itself."

(ibid @ 783)

In 1913, with 163 Proclaimed Forests, Chief Henry Graves claimed that 44 Forests already operated at a profit. He displayed a Forest map and a long-term financial forecast; by 1938 145 Proclaimed Forests would operate at a profit. The other 18 Forests, termed "protection Forests", would not. [Hearings on Estimates of Appropriations for the Fiscal Year Ending June 30, 1915, Before the House Com. on Agriculture, 63 Cong. 2d Sess., 239-311].

W.B. Greeley, Ass't. Chief F. S., firmly stated that:

"A great property like the National Forest with vast industrial resources should, as a matter of business, pay its own way."

USDA Report 114 Jan. 24, 1917 Part 1, Page 97.

The financial goal, he said, was that, "The National Forests [should] secure sufficient revenue as soon as practicable to pay for their upkeep and compensate the Western States for the withholding of property from taxation." (ibid 98)

Two problems that made profitability improbable.

1. Neither the early creators of the Reserves, nor any Chief ever applied a "profitability" test to selecting any of the lands put in the National Forests. Thus it is by chance that some Forests recover timber costs.

Mondell and

Cannon to withdraw their objection. GP did this by promising

to operate the Reserves at a profit. The bill passed, with

the Senate quickly following suit. Mondell had been afraid

that GP would make the Reserves a haven solely for elite

hunters and Cannon viewed GP as a "wild spender".

REW-8
Cont.

One continuously "profit" Forest is the Allegheny in PA., which for the 12 years, 1992-2003 garnered a profit of \$582,836,000, +\$1,093/acre logging 53,834 acres or +\$113.72/MBF cutting 517,360 BF. In 2003 its sale profit rose to +\$3,144/acre or +\$348.50/MBF.

2. There has never been an effective Forest Service cost management or loss control system based on knowing receipts, costs and net.

Big, Long-Term Sales - The Graves National Timber Sale Strategy.

Two Service-wide guides applied to all sales, large or small.

(a) Timber was priced based on whether the F.S. thought the buyer can break-even. It's still priced this way.

(b) Sales, until the '50's required applications, with a refundable payment of the cost to advertise the sale. This was a hold-over from the Interior land sale practice. However, when the F.S., planned a large sale the "application" was typically solicited by the FS, and payment for the advertisement not required.

REW-8
Cont.

Starting in 1912, Chief Graves and Assistant Chief (later Chief) Greeley decided that large long-term development timber sales was their best route to profits. While small sales were often touted the emphasis and bulk of the timber cut was in the long-term sales. Their reasoning was big sales which required putting in a mill and roads would provide results mutually beneficial to conservation, communities, the F.S. and Industry. The result not only would make the N.F.'s an important timber source, but also have the effect of weaning the Industry from its "cut out and get out" behavior. The company's sawmill, road and logging costs were written off by reducing the timber price.

It is of more than passing note that only a small sample of the timber in these proposed large sale was marked beforehand - a violation of the 1897 Act that persisted until stopped by the 1974 4th Circuit Monongahela decision.

Between 1912 and 1929 in the Western U.S., the F.S., made over 50 sales huge, long-term sales. For example, three sales were for over 850 MMBF; 17 sales for 8.5 billion BF averaged 485 MMBF's, with the others over 150 MMBF. Big sales were made in Regions 1-6 on the best lands.

Some big sales were never bid. Other sales were bid, but were canceled uncut with no penalty. Tongass sales repeatedly failed.

The Tongass, The Perpetual Loss Leading Forest.

The Tongass is a classic case where it was the Service, not local pressure, drove their efforts to make small and large long-term sales.

The Washington office 1910 99 year pulpmill sale plan for the Tongass was to bring in newsprint mills to grind its huge Spruce trees into paper.

Between 1912 & 1921, the Tongass offered five long-term sales, each for several billion board feet. These sales were bid, but no timber was cut. Each sale got a "no-penalty cancellation.

On Sept. 1, 1923 Chief Greeley renewed the process, telling his staff:

"We have to get a paper industry established in Alaska within the next 3 or 4 years if it is humanely possible..." Of the sales offered, some were "no bid", the others were bid, never cut then the contracts canceled without penalty.

Pushing Tongass timber on the market as newsprint pulp under large long-term contracts was a continuous deep-seated Forest Service goal.

The Forest Service personnel have spun a numerous myths about why Tongass long-term timber sales are "ordained". The most egregious was that it was the Congress that pushed the 1947 Tongass legislation which the F.S. claimed was passed to permit long-term timber sales.

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Not so! The proposal was a Forest Service initiative that had nothing to do with authorizing long-term sales. In Alaska and in the lower '48 States, large, long-term sales dominated the National Forest timber program from 1910 to the 1950's.

The 1947 Tongass Act was sought by the FS. It's sole purpose was to exempt from liability any firm that bought timber claimed by the Natives.

The H.J. Res. 205 report, and Sec. Krug's letter requesting Congress enact it, had but 1 goal: Assuring that for any Tongass timber sale firms they weren't buying a lawsuit by Native Alaskans. Krug accepted the F.S. claim that it had firms eager to build mills on the Tongass to supply domestic newsprint.

The first F.S. Tongass large sale effort was the 1910 proposed stillborn 99 year pulpmill sale. From then until 1946 the Forest Service spent substantial sums preparing, offering, selling, but always canceling 11 Tongass long-term sales which never had cut a single tree cut.

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Timber sales, large and small, have been a "must" for the FS, despite the huge subsidies they have required over the years.

Since 1980 a series of special Tongass subsidies by Senator Stevens have congressionally mandated; [1] a \$400 million 10 year logging road subsidy, [2] stumpage price reductions and, [3] most recently "no-cost to buyer" timber contract cancellations.

Despite this, the Tongass published its 1989 61 page "R-10-MB-85 which spawned a new myth about the '47 Act.

The brochure waxed; Alaskans needed jobs!; Japan needed wood!; Industry needed incentives to risk construction of mills in Alaska!

This brochure warped the 1947 Congressional Resolution into an direction that the Forest Service guarantee timber to mills to meet the post-war WW II U.S., lumber demand and, Japan's need timber.

It painted a glowing scene; the F.S. offering four long-term 50 year timber sale contracts with 23 billion BF; pulpmills in Ketchikan and Sitka; sawmills in Wrangell, Juneau and Petersburg, logging camps and small communities dotting the Alaska shoreline.

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The Reality.

After WW II, the first of 2 long term sales was awarded noncompetitively, with great difficulty. This 5 billion BF sales in 1948 was "no bid". A 1949 negotiated sale to Ketchikan Pulp (KPC) created a rayon stock mill, which opened 4 years later, not a newsprint mill.

The second sale at Sitka had no bidder. Finally 8 years later, in 1956. a Japanese firm, Alaska Lumber & Pulp (ALP) was induced by the F.S. to take this 5.25 Bil BF sale. This transpired only when it was obvious that there was no prospect of mill to make domestic newsprint. The Japanese pulp mill opened in 1959.

This Japanese firm shipped the paper to Japan. Now logging to produce lumber is the Tongass goal.

KPC-ALP Conspiracy To Control the Tongass.

In the late 1960's KPC and ALP jointly formed a bid rigging and other venal anti-trust conspiracies. Their goal was to drive independent firms out of business in order to gain total control of the Tongass timber. Their plot was prompted by learning that there was not enough merchantable timber on the Tongass to supply the 1 billion BF a year that the F.S. had claimed existed. On this point they were correct. Only a few times did the cut on these 2 sales reached 500 million BF.

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The F.S. turned a blind eye to their conspiracy. Some firms were bankrupted. Some were forced to sell their timber at the low price the conspirators offered. Some of the affected firms brought a successful civil suit against the conspirators².

² Attorneys Dwyer and McNaul in 1975 filed and won private antitrust suits against KPC and ALP. There were several suits, some settled out of Court by KPC. The lead case that went to trial was Reid Bros. v KPC & ALP, C75-165SR 6-8-81, affirmed 81-3444, 81-3448 3-1-83. Reid was awarded a \$3,000,000 judgement plus KPC & ALP paying his court costs and attorney's fees. One estimate is that these suits plus court and legal costs cost KPC and ALP in the neighborhood of \$10,000,000. Not only did the F.S. fail to assist the plaintiffs attorneys, but also seemed to hinder them, to no avail. KPC and ALP in District Court, the Court of Appeals and Supreme Court declined to hear their case. The F.S. never recouped the million of dollars in losses the Government

In 1980, with Pres. Reagan elected, the Senate was sure that ANILCA would fare worse if the House version wasn't accepted. Sen. Stevens, taking advantage of the situation, sprung a floor amendment, creating the Tongass Timber Supply Fund (TTSF). This created a 10 year \$400 million timber road construction subsidy authorization in ANILCA. One result was assurance that the F.S. timber receipts would never come close to its timber costs despite the building untold miles of logging roads. This subsidy, rather than making the Tongass profitable, doubled its sale losses, from

-\$425 million to ,-\$825 million.

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Cont.

For the 10 years, 1981-1990 the Tongass Timber Supply Fund was operative the timber program cash flow was:

Timber Supply Fund	\$400,000,000	\$116.17
Purchaser Road Credit	\$ 70,810,000	\$ 20.57
KV & Salvage Fund	\$ 10,930,000	\$ 3.18
Sale Appropriated Costs	\$318,000,000	\$ 92.40

suffered from their flagrant conspiracy. The Ass't. Sec. of Agriculture at the time the suits should have been filed was John Crowell 1981-86. He had been counsel to KPC's parent company when the conspiracy was hatched and was Sec. of the Panhandle Logging Co., one of the conspirators "bidding fronts". Panhandle, aptly names, had neither logging equipment nor the financial capacity to perform a timber contract. Normally the Service requires a bidder to show he has both the facilities and finances to perform a contract.

25% County Payment	\$ 25,400,000	\$ 7.38
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Total Cost	\$825,140,000	\$239.70
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Less NF Fund Tbr	-\$ 20,000,000	-\$ 5.78
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Net Cash Flow	-\$805,000,000	-\$233.92
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Never in the 23 years, 1980-2003, have timber receipts exceeded costs, nor have they in earlier times. A conservative estimate of the loss is -\$965 million cutting 5.77 billion board feet. This estimate excludes receipts used for Brush Disposal and timber road maintenance, R.O and W.O. timber overhead, and the expanded county payments created by the Secure Rural School Act of 2000.

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Cont.

The average cash price firms have paid for timber is only \$23.00/MBF, which is well below the price paid for most N.F. timber.

Not satisfied with his TTSF subsidy, Stevens next attached an amendment to the 1984 Timber Bailout Act. This rolled back Tongass stumpage rates for several years, further imbedding the Tongass sales in a tsunami of red ink. The Service actually had to refund money to KPC and ALP, although there was no evidence they were in financial trouble. In fact, they hardly could be in trouble when they were paying only \$10.00/MBF for timber. The average price paid for timber cut for 1980-1983 was \$73.50.

KPC & ALP fought every 5 year F.S. reappraisal that sought to raise stumpage prices. In the Reid case, cited with footnote at page 11, (see VI 13 etc., Summary of Conspiracy), discovery showed that KPC & ALP had concealed information on the true financial facts from the F.S. This enabled them to keep down the price they paid for timber at each 5 year reappraisal as well as what they paid contractors for their logs.

In addition, permission to export "cants", granted earlier to KPC and ALP, let millions of board feet of high grade logs, claimed to be cants were bought at bargain stumpage prices for export to Japan. Prime high quality logs, sawn on only 2 sides, (which saved shipping costs), were resawn into lumber in Japan.

The Tongass Timber Receipts for 15 years, 1983-1997, record based on a cut of 4,463,923 MBF is instructive:

Gross Timber Receipts	\$217,155,519	\$48.65/MBF
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Sale Receipts Consumed

PRC	\$148,999,127	\$33.38
K.V.	\$ 13,425,361	\$ 3.01
Salvage Fund	\$ 20,186,911	\$ 4.52
25% Payment	\$ 54,288,880	\$12.16

Tot. Rec. Consumed	\$236,900,279	\$52.97/MBF

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Taxpayer LOSS Before Counting
Timber Sale Appropriations

- \$ 19,744,760 - \$ 4.32/MBF

THE HISTORY OF ALASKA TIMBER SALES.

Specific Tongass data isn't available to me for some years due to the way the long-term contract timber "sold" was reported, but the Chugach cut is so small that showing Region 10 data from annual reports tells the Tongass story.

From 1910-1949 the average annual cut on the Alaska National Forests was 45 MMBF, with a cash price of only \$1.53/MBF. The 1940-49 nominal stumpage price was actually 11% less than in the 1930's. The 40 year average price was 60% less than the \$3.74/MBF price the F.S. got in the lower '48 States.

With the advent of the long-term sales the cut rose but the disparity with the F.S. timber prices in the lower '48 grew even more.

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	Alaska				Rest Of N.F.'s	
	Mil. BF Ave.	PerMBF Ave.	Pcnt Vol.	Pcnt Price	Bil. BF Ave.	PerMBF Ave.
1910-49	45	\$ 1.53	4%	42%	1.052	\$ 3.64
1950-59	139	\$ 2.42	17%	17%	3.497	\$ 14.54
1960-69	421	\$ 2.68	4%	16%	10.591	\$ 17.65
1970-79	504	\$ 6.85	5%	13%	10.731	\$ 52.66
1980-89	343	\$ 7.07	3%	9%	10.372	\$ 82.19
1990-99	254	\$28.34	5%	23%	5.155	\$133.44
2000-03	70	\$36.30	3%	36%	2.006	\$ 99.92

The bargain prices for stumpage awarded KPC and ALP under their long-term contracts didn't result in

their continuing operations when the firms decided in the early '90's that operations weren't as profitable as they desired. On Feb. 21 the U.S. Court of Federal Claims that ALP is not entitled to one cent of the \$8.7 Billion it sought from the U.S. Treasury.

Tongass Roads.

Because logging construction and maintenance rely heavily on financing by the use of timber as money, a shrinking sales level, spells road problems.

In addition to the Stevens 1980 TTSP for roads, which totaled \$400,000,000, the Tongass has granted purchaser \$184,547,000 in Purchaser Road Credits to firms to build logging roads. The Tongass possibly spent another \$60,000,000 engineering these roads, \$5,000,000 on road maintenance, a total of \$550,000,000 to secure a 3,566 mile road system. These roads don't an inter-connected system because of the insular-peninsular nature of the lands. Tongass logging roads on islands and other isolated mainland areas run from the sale area landing to the water's edge where the logs are dumped in the water to be rafted to a mill.

TSPIRS provided road data for only for 1987-1998, 12 years, on the miles of new logging roads vs. miles rebuilt, by both appropriated funds and PRC. This data includes the last 3 years of the TTSP road funding. Attachment "Roadtong.wk3" traces the 2,200 miles built-rebuilt in that period. As the cut fell, the road program fell, but reconstruction became more prevalent

REW-8
Cont.

What Does This Tortuous Chain Of Events Reveal??

1. Of special note, especially since 1947, when 2 long-term sale idea was reactivated, the sole reason was newsprint production for U.S. newspapers. This never happened.
2. The F.S. 1946 and earlier estimate that there was 85 billion board feet of Tongass timber, which properly managed (i.e. marketed and logged), would yield an annual cut of 1 bil. BF a year in perpetual 85 year rotations, was neither realistic nor ever attained. The highest cut decade, the '70's had a 500 MMBF cut. The cut fell to 343 MMBF in the '80's.
3. The KPC-ALP long-term sales ran until the mid '90's. These firms were permitted to select the areas they would log. They picked the best timber, high-grading the Forest. For years the F.S. didn't select the cutting areas. They were terminated for nonperformance by Chief Jack Ward Thomas.
4. ANILCA permitted the Native Corporations to select some of the best Tongass timber. They did so, logging and exporting this timber at an unsustainable pace. As a result their cut peaked, then fell precipitously as shown at DEIS page 3-63.
5. The record makes it abundantly clear that every level of timber sales on the Tongass has required substantial taxpayer-supported subsidies. The Tongass past is its prologue. Long-term sales haven't produced any of the benefits that the Service has touted.
6. The forest based resources of the Tongass, which are more than timber, are substantial in quantity, with unique qualities. The Tongass is a rain forest which is an important asset in its own right.

REW-8
Cont.

Setting effective policy and program, on the Tongass and elsewhere, rests:

- A. On having a solid foundation of the actual events that have shaped Tongass timber cutting.
- B. Having a sound picture of the multiple resources.
- C. Forming a realistic determination of what to do, how to do it and when to do it.
- D. Having sound facts on F.S. sale and management costs.

And finally;

- E. A public agency dealing in situations where commercial and noncommercial values are at stake must weigh which functions can recover costs.

For those actions that can't recover costs, the positive and negative aspects, financial and otherwise, of proposed actions, should be guides to making choices of appropriate actions.

It's important to bear in mind what Sec. 4. of MUSY actually says:

(a) "Multiple use" means the management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or

REW-8
Cont.

all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output."

MUSY is not a license to lose money. The definition in the law specifically warns the F.S. not to seek either "the greatest dollar return or the greatest unit output."

To be blunt - managing subsidies is what the Forest Service is about in every one of its programs and most of its timber sales. It's a challenging task.

To be moderately successful, the way the situation that managers face needs to be understood, accurately portrayed and have focused corrective action.

The Forest Service has continually failed to do this on the Tongass - and - where it has the same problems on many other Forests, especially those where nearly all of the timber receipts are consumed by Purchaser Road Credits, K.V., Salvage and associated costs. The Tongass is clearly the "worst case" example. Its 12 year, 1992-2003 losses average -\$4,929 per acre cut. The loss exceeded -\$18,000 per acre in 2002 then jumped to over -\$32,000/acre in 2003.

Recommendation.

The Couverden Sale should be postponed. Instead, if the Tongass desires to proceed with sales the staff should consider what portion of the 138,000,000 BF just returned can be reoffered with the least adverse

REW-8
Cont.

REW-9

ecological impacts and the lowest Treasury monetary loss.

The Tongass should conduct a comprehensive review, with assistance from the PNW Research Station, to chart which lands on the Tongass can support a timber program conducted using pragmatic financial and environmental impact considerations.

REW-9
Cont.

Robert E. Wolf
Fellow, Society of American Foresters.

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410-586-1767 FAX # 410-586-2208.

Email bobwolf@chesapeake.net

Mar. 22, 2004

Attachments: 1. Tonghist.wk3
2. Tongsale.wk3
3. Tong12yr.wk3
4. Tongcuts.wk3
5. Roadtong.wk3

From page 1

To: Comments-alaska-tongass-juneau@fs.fed.us
attention Dave Carr

Comments on Proposed Couverden Timber Sale.
by Robert E. Wolf,
Fellow, Society of American Foresters.

Timber Roads, Region 10	12 Years	TSPIRS Timber Program														
			Ratio RBLD-New	% Mi. Approp	Percent PRC	Grand Tot PRC + AP	New Tot Mi.	% Mi Rebuilt	ReBuild Tot	New Mi. Approp	New Mi. PRC	ReBuild Approp	ReBuild PRC	Approp Mi New/Recon	PRC Mi New/Recon	MBF Cut
The Deteriorating Timber Road System! In 1998 8.2 miles were rebuilt for each new mile Of the 2,000 miles Built/Rebuilt 88% was PRC funded & 40% was Rebuilding	1987-1998															
RoadTong.wk3																
Tot '87-98	0.7	11.9%	88.1%	2,200.0	1,323.2	40%	876.8	103.0	1,220.2	158.4	718.4	261.4	1,938.6	3,550,568		
1998	8.2	19%	84%	59	6.4	89%	53	1	6	9	44	9	50	119,762		
1997	1.1	3%	97%	163	79	52%	85	0	79	4	81	4	159	106,639		
1996	1.4	44%	69%	282	115	59%	167	0	115	86	81	86	196	120,186		
1995	1.0	0%	100%	250	124	50%	126	0	124	1	125	1	249	221,165		
1994	0.4	1%	99%	173	123	29%	50	0	123	1	49	1	172	275,791		
1993	0.6	12%	89%	161	98	39%	63	3	95	14	49	17	144	325,297		
1992	0.3	0%	100%	335	250	25%	85	1	249	0	85	1	334	369,698		
1991	1.2	2%	98%	171	79	54%	92	3	76	1	91	4	167	363,708		
1990	0.8	26%	79%	155	86	45%	69	2	84	30	39	32	123	470,711		
1989	0.5	9%	92%	162	109	33%	53	6	103	7	46	13	149	444,607		
1988	0.3	43%	70%	143	108	24%	35	37	71	6	29	43	100	397,345		
1987	0.0	52%	66%	146	146	0%	0	50	96	0	0	50	96	335,660		

Tongass
Timber
Not sure how
FS lalled the
L/T Contracts.

Tongass.wk3
For the 17 Years 21% of
the Volume was Rejected
by Industry
For the 9 years, 1995-2003
Industry Rejected 41% of
the Timber Offered!

However, the Cut was
30% Over the Volume
Sold!

The Sold Price '03 v '95
fell -29% but the cut price
fell -50% !

1987-2003 17 Years

	Offered MMBF	Sold MMBF	Diff MMBF	Percent Rejected	Sold Price	Sold Per MBF	Cut MMBF	Cut v Sold MMBF	Pent Cut vs Sold	Cut Price	Cut Per MBF
1987-1998											
Tongass	462.0	485.0	23.0	5%			343.0	(142.0)	-29%		
1987	349.0	316.0	(33.0)	-9%			398.0	82.0	26%		
1988	321.0	252.0	(69.0)	-21%			444.0	192.0	76%		
1989	340.0	330.0	(10.0)	-3%			470.0	140.0	42%		
1990	396.5	405.5	9.0	2%			363.3	(42.2)	-10%		
1991	481.1	429.0	(52.1)	-11%			369.7	(59.3)	-14%		
1992	266.5	117.8	(148.7)	-56%			325.3	207.5	176%		
1993	259.7	51.7	(208.0)	-80%			275.8	224.1	433%		
1994	290.5	92.6	(197.9)	-68%	\$5,100,000	\$55.08	221.2	128.6	139%	\$12,705,000	\$57.44
1995	266.0	69.3	(196.7)	-74%	\$12,300,000	\$177.49	120.2	50.9	73%	\$14,450,000	\$120.22
1996	162.4	152.2	(10.2)	-6%	\$10,501,143	\$69.00	106.6	(45.5)	-30%	\$2,100,000	\$19.69
1997	187.1	24.5	(162.6)	-87%	\$1,198,233	\$48.91	119.8	95.3	389%	\$4,991,831	\$41.68
1998											
1999-2002											
Region 10											
1999	116.2	61.4	(54.8)	-47%	\$1,088,228	\$17.72	145.8	84.3	137%	\$5,455,668	\$37.43
2000	85.6	170.7	85.1	99%	\$326,440	\$1.91	147.1	(23.6)	-14%	\$2,060,765	\$14.01
2001	23.0	49.6	26.6	116%	\$1,766,531	\$35.62	47.8	(1.8)	-4%	\$1,855,124	\$38.81
2002	57.5	24.4	(33.1)	-58%	\$592,551	\$24.31	33.8	9.4	39%	\$1,242,027	\$36.73
2003	88.9	36.4	(52.4)	-59%	\$1,427,920	\$39.17	51.3	14.9	41%	\$1,463,863	\$28.53
20 Y Tot	4,152.9	3,068.1	(1,084.8)	-22%			3,982.7	914.5			
20 Y Av	230.7	180.5	(50.2)			-29%	234.3	53.8	30%		-50%
							146%				

'95-03 Av95-03	95-03 Av95-03	Stevens Relief	9 Year Span	1,277.1 127.7	681.1 75.7	(596.0) (66.2) -41%	-41%	\$34,301,045 \$3,811,227	\$50.36	993.6 110.4 146%	312.4 34.7	46%	\$46,324,278 \$5,147,142	Stevens Relief '95-03 Av95-03 \$46.62 -7%
			8 years, 1995-2002											
'95-02 T Av95-02	'95-02 T Av95-02	Stevens Relief		1,188.2 132.0	644.7 80.6	(543.5) (51.4)	-39%	\$32,873,125 \$4,109,141	\$50.99	942.3 117.8	297.6 37.2	46%	\$44,860,415 \$5,607,552	
			Offered MMBF Uncur Tbr Contract MMBF		Sold MMBF	Diff MMBF	Percent Rejected	Sold Price	Sold Per MBF	Cut MMBF	Cut v Sld MMBF	Pent Cut vs Sold	Cut Price	Cut Per MBF
1995	1995		103											
1996	1996		149					\$598,504	24.1089224					
1997	1997		264											
1998	1998		230											
1999	1999		234											
2000	2000		336											
2001	2001		337											
2002	2002		296											
02 v 95	02 v 95		1.9		times Greater.									

1987-2003 17 Years

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Not sure how
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2002	57.5	24.4	(33.1)	-58%	\$592,551	\$24.31	33.8	9.4	39%	\$1,242,027	\$36.73
2003	88.9	36.4	(52.4)	-59%	\$1,427,920	\$39.17	51.3	14.9	41%	\$1,463,863	\$28.53
20 Y Tot	4,152.9	3,068.1	(1,084.8)	-22%			3,982.7	914.5			
20 Y Av	230.7	180.5	(63.8)				234.3	53.8	30%		
							146%				

	Tongass NF Timber Cash Flow Tot. NF Ac.	12 Years, 1992- 2003 16,611,863	Tongl 2yr. wk 3 Ac Cut & Jobs Est '00 & '01					
	Ac Suit For Tbr Prod	676,000						
	% Ac in Tbr. Prod	4.1%						
	ASQ MBF	187,000						
	Cut as % of ASQ	78%						
	Growth/Ac BF	361						
	Growth/ac CF	72						
	Total * Road Mi.	3,567						
	**" Tot miles don't add							
A	B P/L With Overhead & 25% Cost **	C Tot P/L Per Acre	D Tot P/L Per MBF	E Acres Cut	F MBF Cut	G Cut Per Ac MBF's		
1992	(\$52,370,879)	(\$4,524)	(\$141.66)	11,577	369,698	31,934		
1993	(\$39,028,955)	(\$3,707)	(\$119.98)	10,529	325,297	30,895		
1994	(\$33,886,063)	(\$3,726)	(\$122.87)	9,095	275,791	30,323		
1995	(\$28,715,351)	(\$4,078)	(\$129.84)	7,042	221,165	31,407		
1996	(\$22,779,684)	(\$5,046)	(\$189.54)	4,514	120,186	26,625		
1997	(\$31,038,485)	(\$13,813)	(\$291.06)	2,247	106,639	47,458		
1998	(\$20,537,673)	(\$5,056)	(\$171.49)	4,062	119,762	29,483		
1999	(\$16,761,324)	(\$16,948)	(\$115.00)	989	145,750	147,371		
2000	(\$11,046,875)	(\$2,218)	(\$75.22)	4,980	146,860	29,490		
2001	(\$15,896,673)	(\$9,813)	(\$332.60)	1,620	47,795	29,503		
2002	(\$22,522,685)	(\$18,492)	(\$666.09)	1,218	33,813	27,761		
2003	(\$25,626,425)	(\$33,630)	(\$499.49)	762	51,305	67,329		
Total	(\$320,211,073)			58,635	1,964,059			
Aver.	(\$26,684,256)	(\$5,461)	(\$163.04)	4,886	163,672	33,496		
5 years, 1992- 1996								
T '92-96	(\$176,780,933)			42,757	1,312,137			
A 92-96	(\$35,356,187)	(\$4,135)	(\$134.73)	8,551	262,427	30,688		
stevens 8 year bail out 1995- 2002								
8 Y T	(\$169,298,750)			26,672	941,969			

1992	13,004,033	27,316,534	24,238,259	6,990,986	\$6,829,134	65,374,912	\$18.91
1993	15,502,397	17,493,444	25,865,840	6,798,707	\$4,373,361	54,531,352	\$20.90
1994	34,150,539	28,904,444	25,871,740	6,034,307	\$7,226,111	68,036,602	\$21.88
1995	29,827,987	20,232,636	26,502,587	6,749,956	\$5,038,159	58,543,338	\$30.52
1996	22,607,354	11,202,599	26,078,793	5,304,996	\$2,800,650	45,387,038	\$44.14
1997	3,741,997	1,987,590	26,425,518	5,870,477	\$496,898	34,780,482	\$55.05
1998	6,249,372	1,851,555	19,915,662	4,556,939	\$462,889	26,787,045	\$38.05
1999	6,850,939	4,279,896	14,181,406	4,080,987	\$1,069,974	23,612,263	\$28.00
2000	8,369,220	3,497,883	10,931,666	4,112,075	\$874,471	19,416,095	\$28.00
2001	3,859,638	3,397,980	14,170,583	1,338,252	\$849,495	19,756,310	\$28.00
2002	2,306,902	1,333,162	16,378,490	6,784,645	\$333,290	24,829,587	\$200.65
2003	4,729,060	3,275,638	16,000,000	10,260,938	\$818,909	30,355,485	\$200.00
Total	151,199,438	124,773,361	246,560,544	68,883,265	31,193,340	471,410,511	
Aver.	12,599,953	10,397,780	20,546,712	5,740,272	2,599,445	39,284,209	\$35.07

5 years, 1992-1996

T '92-96	115,092,310	105,149,657	128,557,219	31,878,952	26,287,414	291,873,243	
A 92-96	23,018,462	21,029,931	25,711,444	6,375,790	5,257,483	58,374,649	\$24.30

stevens 8 year
bail out 1995-2002

8 Y T	31,378,068	47,783,302	154,584,705	38,798,327	11,945,825	253,112,159	
8 Y AV	5,229,678	5,972,913	19,323,088	4,849,791	1,493,228	31,639,020	\$41.19

Nat. For. Fund K.V. Fund Purch Road Cred. Salvage Fund Assoc. Charges

1992	(14,312,501)	4,442,032	20,479,529	2,122,219	272,754		
1993	(1,991,047)	2,433,676	12,866,230	1,177,947	1,015,591		
1994	5,246,095	2,563,342	22,913,669	3,274,297	153,136		
1995	9,595,351	983,868	16,980,017	2,149,975	118,776		
1996	11,404,755	385,365	7,982,729	2,724,369	110,136		
1997	1,754,407	732,029	745,895	496,209	13,457		
1998	4,397,817	741,300	306,635	715,389	88,232		
1999	2,571,043	2,005,896	1,494,554	753,806	25,640		
2000	4,871,336	249,721	1,447,390	1,763,034	37,738		
2001	461,658	300,633	2,033,306	1,038,767	25,274		
2002	973,740	(56,832)	996,859	375,254	17,881		
2003	1,453,422	(5,354)	2,730,615	532,377	18,000		
Total	26,426,077	14,775,677	90,977,427	17,123,642	1,896,615		
Aver.	2,202,173	1,231,306	7,581,452	1,426,970	158,051		

5 years, 1992-1996

T '92-96 A 92-96 stevens 8 year bail out 1995- 2002 8 Y T 8 Y AV	9,942,653 1,988,531 15,030,001 2,305,000	10,808,283 2,161,657 3,972,748 662,125	81,222,174 16,244,435 7,024,638 1,170,773	11,448,807 2,289,761 5,142,458 857,076	1,670,393 334,079 208,222 34,704	25% Cost Per MBF \$0.97/MBF	Tot Cost Per MBF	NFF,Tbr Per MBF	KV Per MBF	PRC Per MBF	Salvage Per MBF	Assoc Chg Per MBF
	Receipts Per MBF Includes \$1,896,000 BD & RM Coop Dep; ****	Rec. Used Per MBF	Rec Unused Per MBF	Percent Unused	Sale Prep +0hd/MBF							
1992	\$35.17	\$73.89	(\$38.71)	-110%	\$84.47	\$18.47	\$176.83	(\$38.71)	\$12.02	\$55.40	\$5.74	\$0.74
1993	\$47.66	\$53.78	(\$6.12)	-13%	\$100.41	\$13.44	\$167.64	(\$6.12)	\$7.48	\$39.55	\$3.62	\$3.12
1994	\$123.83	\$104.81	\$19.02	15%	\$115.69	\$26.20	\$246.70	\$19.02	\$9.29	\$83.08	\$11.87	\$0.56
1995	\$134.87	\$91.48	\$43.39	32%	\$150.35	\$22.87	\$264.70	\$43.39	\$4.45	\$76.78	\$9.72	\$0.54
1996	\$188.10	\$93.21	\$94.89	50%	\$261.13	\$23.30	\$377.64	\$94.89	\$3.21	\$66.42	\$22.67	\$0.92
1997	\$35.09	\$18.64	\$16.45	47%	\$302.85	\$4.66	\$326.15	\$16.45	\$6.86	\$6.99	\$2.56	\$0.13
1998	\$52.18	\$15.46	\$36.72	70%	\$204.34	\$3.87	\$223.67	\$36.72	\$6.19	\$2.56	\$5.97	\$0.74
1999	\$47.00	\$29.36	\$17.64	38%	\$125.30	\$7.34	\$162.01	\$17.64	\$13.76	\$10.25	\$5.17	\$0.18
2000	\$56.99	\$23.82	\$33.17	58%	\$102.44	\$5.95	\$132.21	\$33.17	\$1.70	\$9.86	\$12.00	\$0.26
2001	\$80.75	\$71.10	\$9.66	12%	\$324.49	\$17.77	\$413.36	\$9.66	\$6.29	\$42.54	\$21.73	\$0.53
2002	\$68.22	\$39.43	\$28.80	42%	\$685.03	\$9.86	\$734.31	\$28.80	(\$1.68)	\$29.48	\$11.10	\$0.53
2003	\$92.18	\$63.85	\$28.33	31%	\$511.86	\$15.96	\$591.67	\$28.33	(\$0.10)	\$53.22	\$10.38	\$0.35
Total												
Aver. ****	\$76.98	\$63.53	\$13.45	17%	\$160.61	\$15.88	\$240.02	\$13.45	\$7.52	\$46.32	\$8.72	\$0.97
ASR Receipts don't agree with C/S report because ASR includes PRC, BD & Coop RD												
5 years, 1992- 1996 T '92-96 A 92-96	\$87.71	\$80.14	\$7.58	9%	\$97.98	\$24.30	\$20.03	\$7.58	\$8.24	\$61.90	\$8.73	\$1.27
stevens 8 year bail out 1995- 2002 8 Y T 8 Y AV	\$44.41	\$50.73	(\$6.31)	-14%	\$205.30	\$12.68	\$268.71	\$21.27	\$5.62	\$9.94	\$7.28	\$0.29
	Receipts	Rec. Used	Rec Unused	Percent Unused	Sale Prep	25% Cost	Tot Cost	NFF,Tbr	KV	PRC	Salvage	Assoc Chg

Response to Public Comments on the DEIS

The reason that Sold & Cut don't match is

that
the Long-Term
Volume isn't
counted in SOLD
From 1983-1994 the
Volume and Dollars
are estimated
because Chugach
not available to
exclude.
*** Stat-Hi is a FS
term means only
cash money
counted, not PRC
and Coop Dep.

Subsidy

FY Year	Timber Cut MBF	Dollars Paid Stat Hi *	Dol Per MBF Cut	Sold MBF	Dollars Stat Hi Stat Hi *	Sold Per MBF	Acres Cut	Vol. Cut Pr/Ac MBF	Jobs TSPRS 1987-1998	Per Worker
1983	250,482	\$654,000	\$2.61	81,890	\$1,199,000	\$14.64	8,349	30,000	2,123	\$30,000
1984	260,977	\$4,860,000	\$18.62	52,300	\$1,000,000	\$19.12	8,699	30,000	2,212	\$30,000
1985	231,035	\$2,840,000	\$12.29	41,664	\$367,000	\$8.81	7,701	30,000	1,958	\$30,000
1986	290,622	\$515,000	\$1.77	189,000	\$1,527,000	\$8.08	9,687	30,000	2,163	\$30,000
1987	335,660	(\$3,282,000)	(\$9.78)	169,835	\$3,954,000	\$23.28	11,189	30,000	2,301	(\$31,604)
1988	397,345	\$1,802,000	\$4.54	70,022	\$2,035,728	\$29.07	9,677	41,061	3,385	(\$23,274)
1989	444,607	\$3,712,000	\$8.35	100,447	\$10,233,000	\$101.87	13,470	33,007	3,859	(\$22,446)
1990	470,711	\$16,000,000	\$33.99	29,600	\$3,570,000	\$120.61	13,997	33,629	4,082	(\$21,187)
1991	363,708	\$13,750,000	\$37.81	52,700	\$2,320,000	\$44.02	10,713	33,950	3,096	(\$11,216)
1992	369,698	\$13,840,000	\$37.44	83,100	\$2,000,000	\$24.07	11,577	31,934	3,149	(\$17,296)
1993	325,297	\$3,400,000	\$16.60	138,050	\$4,400,000	\$31.87	10,529	30,895	2,765	(\$13,795)
1994	275,791	\$10,800,000	\$39.16	54,100	\$7,000,000	\$129.39	9,095	30,323	2,273	(\$13,565)
1995	221,165	\$12,705,000	\$57.45	96,200	\$1,100,000	\$53.01	7,042	31,407	1,819	(\$10,967)
1996	120,186	\$14,450,000	\$120.23	72,000	\$12,300,000	\$170.83	4,514	26,625	988	(\$7,570)
1997	106,639	\$2,100,000	\$19.69	152,186	\$10,501,143	\$69.00	2,247	47,458	881	(\$11,171)
1998	119,762	\$4,991,831	\$41.68	24,051	\$1,198,233	\$49.82	4,028	29,732	989	(\$9,220)
1999	145,750	\$5,455,668	\$37.43	61,426	\$1,088,228	\$17.72	3,672	39,692	1,205	(\$11,382)
2000	146,860	\$3,582,863	\$38.01	170,329	\$5,088,741	\$29.88	5,923	24,795	1,214	(\$9,800)
2001	47,795	\$1,855,124	\$38.81	49,592	\$1,766,531	\$35.62	1,927	24,800	395	(\$13,358)
2002	33,813	\$1,242,027	\$36.73	24,372	\$592,551	\$24.31	1,218	27,761	279	(\$10,680)
2003	51,305	\$1,463,863	\$28.53	36,449	\$1,427,920	\$39.18	1,900	27,000	424	(\$7,605)
20 Y Tot	4,957,901	\$119,273,513		1,749,313	\$78,669,074		157,155		41,559	
20 Y Av	247,895	\$5,963,676	\$24.06	83,301	\$3,746,146	\$44.97	7,484	33,125	1,979	(\$20,028)
AV '83-87	273,755	\$6,396,400	\$23.37	106,938	\$4,422,546	\$41.36	9,125	30,000	2,151	(\$33,405)
AV '88-92	409,214	\$11,439,000	\$27.95	67,174	\$6,160,000	\$91.70	11,887	34,426	3,073	(\$9,819)
AV '93-97	209,816	\$10,996,667	\$52.41	102,507	\$2,906,667	\$28.36	6,685	31,384	1,745	(\$24,321)
AV '98-03	90,881	\$3,431,896	\$37.76	61,037	\$1,860,367	\$30.48	10,400	8,738	2,729	(\$2,822)

AV 95-03	110,364	\$5,538,486	\$50.18	76,289	\$4,340,372	\$56.89	3,608	30,589	910	(\$10,188)
Av 95-99	142,700	\$7,940,500	\$55.64	81,173	\$6,037,521	\$74.38	4,301	33,181	1,176	(\$10,218)
AV 00-03	44,304	\$1,520,338	\$34.32	36,804	\$1,262,334	\$34.30	1,682	26,343	366	(\$10,456)
00-03 v 95-99	31%	19%	62%	45%	21%	46%	39%	79%	31%	102%
	Timber Cut MBF	Dollars Paid	Dol Per MBF Cut	Sold MBF	Dollars Stat Hi	Sold Per MBF	Acres Cut	Vol. Cut P/Ac MBF	Jobs TSPRS	Subsidy Per Worker

Response to Robert E. Wolf

REW-1: Your extensive comments on the history of the Tongass, including acres available for timber harvest, are noted. You are correct that road construction and logging costs are high and timber values are often low. However, the Tongass National Forest is required by the Tongass Timber Reform Act to seek to meet the annual market demand for timber. Your conclusion that the cancellation of 20 sales should lead to the cancellation of the Couverden project is not correct. The cancelled sales were sold at a time when timber prices were high and they are no longer economical under current market conditions. Any sales sold in the Couverden area would be sold at current market conditions (assuming that prices rise to a point where the sale would be economical). You note that “the current Forest Plan only rates 670,000 acres ‘Suitable,’ just 4% of the Forest.” This is correct because the majority of the 2.3 million acres of productive forest land is in wilderness or LUDs that do not allow timber harvest, not because only 4 percent of the land contains productive forest land.

REW-2: Your comments on recent Congressional legislation are noted. However, nothing in this legislation changes the requirements of the Tongass Timber Reform Act.

REW-3: Paper copies of the DEIS were available for those wishing a copy, as was a CD with the document.

REW-4: The volume per acre harvested is lower than past sales because selection harvest is proposed for many of the units and at least 10 percent of the volume in the units with a clearcut with reserves prescription would be left.

REW-5: Your comments on timber sale economics and mill capacity are noted. As noted in Chapter 2 of the DEIS, a mix of large and small sales would be considered, except for Alternative 5, which is only small sales.

REW-6: The comment is correct that the analysis used for this project (NEAT) does not address receipts to be consumed by PRC, KV, Brush Disposal and Road Maintenance Coop Deposits, and the Salvage Fund or the net that will be left. Estimated gross receipts are calculated by multiplying total projected volume (CCF) by the expected appraisal rate (\$/CCF). In this case, gross receipts would be negative for each alternative under current market conditions. Please note that unlike many other national forests, KV and brush disposal costs are generally limited to reforestation surveys. There are no Coop roads in the Couverden project area.

NEAT does consider the funds that will be used for sale preparation and administration costs. These estimates are presented per CCF in the Public Investment Analysis section on page 3-72 of the EIS and include costs for analysis (NEPA preparation), sale preparation, sale administration, and engineering support.

REW-7: Your comments on the Tongass timber sale program are noted. They are a Forest Plan issue and are beyond the scope of this analysis.

REF-8: Your comments on the world timber market, on the historical timber profitability problems of the Forest Service, and the timber management history of the Tongass are noted.

REW-9: Your recommendation that the Couverden sale be postponed and your request for a comprehensive review of which lands can support a timber program are noted. Please note that timber would not be offered until timber prices increased enough that the sale is economical. The proposed harvest units are on land identified as suitable in the Forest Plan (and field verified during planning for this project). A comprehensive review of all suitable lands on the Tongass National Forest is beyond the scope of this project.



March 29, 2004

Mr. Dave Carr
USDA Forest Service
Tongass National Forest-Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801-8041

Re: Couverden Timber Sales Draft EIS Review

Dear Mr. Carr:

Sealaska Corporation has reviewed the DEIS for the above referenced proposed timber sales and offers the following comments for consideration.

The volume contemplated for offer in the Couverden sales is very important towards meeting requirements as set forth in the TTRA and in meeting TLMP goals. In addition, because so few sales are offered in the northern part of the Tongass National Forest, the sales contemplated from Couverden are especially important for supplementing and broadening the local economies of Hoonah and other nearby communities. Therefore, volume offered must be economical in order for the local economies of communities in this sub-region to benefit. Unfortunately, the net stumpage values for all the alternatives are negative. Therefore, Sealaska recommends that if no changes are made in the planned layout, the sales be placed on the shelf until such time as they can return a favorable stumpage to the Forest Service.

In addition, Sealaska Corporation recommends that the Forest Service review the units to determine how they can be modified in order to reduce logging costs by incorporating more conventional timber harvest systems such as having roads reach all units and reducing selection harvest units. The other method by which the return to the Forest Service can be enhanced is to increase the proportion of higher value species and volume in the harvest mix.

With these factors in mind, Sealaska recommends that HS 5, HS 7, and H 17 be considered for clearcut. Also, a reasonable proportion of the units to be clearcut with reserves should be modified to reduce or eliminate the reserves. Finally, the proportion of high value timber stands should be increased in order to provide a better return.

SEA-1

SEA-2

SEA-3

SEA-4

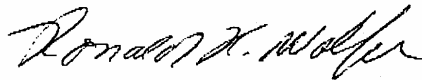
SEA-5

Based on the manner in which the Couverden area is being developed, there is plenty of room to make such changes while still providing corridors and protection for key mammalian species.

SEA-6

Thank you for providing Sealaska the opportunity to comment.

Sincerely,



Ronald R. Wolfe
Corporate Forester

Response to Ronald Wolfe, Sealaska Corporation

SEA-1: We recognize that timber harvesting is important for the Hoonah economy and other nearby communities and that it must be economical.

SEA-2: Only Alternatives 2 and 4 include helicopter yarding. Selection harvest, where prescribed, is used to meet the scenery objectives.

SEA-3: Units HS5, HS7, and H17 are in a Scenic Viewshed and have a VQO of Partial Retention. Harvest activities in areas with a VQO of Partial Retention are to remain visually subordinate to the natural landscape. These units are easily visible from KVA 2, which is in Icy Strait (refer to Table 3-36 and Figures 3-11 to 3-14 in the DEIS). Therefore they have a selection harvest prescription.

SEA-4: Trees are left in units with a clearcut with reserves prescription in order to meet long-term habitat needs and, in some cases, to mitigate visual disturbance.

SEA-5: While you are correct that the proportion of high-value timber stands could be increased to provide a better return, this could adversely affect wildlife, such as deer, wolves, and marten. We attempted to strike a balance, as directed by the Forest Plan.

George Woodbury

Written Comment Sheet
Public Meeting for the Couverden Timber Sales DEIS

Thank you for your input.

Received
Date: Mar. 16, 04

PLEASE PRINT:

Design timber sold in the economic and
in volume large enough to amortize
the investments necessary to log timber.

GW-1

****Continue on back for more space****

NAME: <u>George Woodbury</u>
ORGANIZATION: <u>AK For Assn</u>
E-MAIL ADDRESS: <u>woodbur@adfaalaska.net</u>
MAILING ADDRESS/CITY/STATE/ZIP: <u>Box 1934 Wrangell AK 99929</u>

Names and addresses will be added to the mailing list for the Couverden Timber Sales EIS. Please be advised that by adding your name and address, you are agreeing to be part of the EIS public record.

Please hand your comments in or MAIL BEFORE March 29, 2004.

Comments may be mailed to:

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

E-mail comments may be sent to: comments-alaska-tongass-juneau@fs.fed.us

Comments may be faxed to: (907) 586-8808

Response to George Woodbury, Alaska Forest Association

GW-1: The Couverden proposal provides a range of timber harvest alternatives that includes large sales that seek to amortize investment over a higher volume of timber volume, as you suggest.

Frank Wright



Hoonah Indian Association

P.O. Box 602

Hoonah, AK 99829-0602

Phone (907) 945-3545 Fax (907) 945-3703



March 1, 2004

Couverden Timber Sales Comments
Forrest Cole: Forest Supervisor
Dave Carr: Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, AK. 99801-8041

RECEIVED

MAR 08 2004

Juneau Ranger
District

Dear Mr. Cole,

The Hoonah Indian Association is a duly constituted Tribal Government in accordance with and by the authority of the Acts of Congress of June 18, 1934 (48 Stat.984) and May 1, 1936 (49 Stat. 1250). Sharing a common bond of ancestral family lineage, Hoonah Tlingit people are the original people occupying the Icy Strait Region, including all of Glacier Bay and the surrounding area, prior to European contact and recorded history.

As President of the Hoonah Indian Association I appreciate the opportunity to submit these comments, regarding the Couverden Timber Sales, on behalf of all Huna Tlingit people, who consider the Couverden project location to be well within recognized boundaries of customary and traditional use. Our people continue to rely on the variety of resources available in the Couverden Project Area.

Additionally, and perhaps most significantly, I submit these comments on behalf of the Kaagwaantaan Clan of Hoonah, who have recently come forward to express specific concerns and strong reaction toward the impact that further road construction, significant timber harvesting and the reactivation of the previously used Log Transfer Facility will have on the historic and cultural significance, attributed to the Couverden Project Area.

It is the Kaagwaantaan Clan of the Hoonah Tlingit that historically and traditionally laid claim to the entire area that the Couverden Project Area finds itself within. Indeed, the Kaagwaantaan Clan of Hoonah maintain a connection to this land that far exceeds the level of historic significance identified in the Final Resource Report for Heritage Resources prepared for the Tongass National Forest, Juneau Ranger District in March 2003 by T. Weber Greiser, Senior Technical Archaeologist and Principal Investigator for Historical Research Associates, Inc.

While it is true, as the Heritage Report indicates, that the traditional practitioners among the Tlingit people living in Hoonah maintain "strong connections" with specific locations

HIA-1

HIA-2

and general areas along coastal portions of the project area, I submit that the strong connection that the Kaagwaantaan Clan continues to hold for this entire area is not to be thought limited, merely to the archaeological confines of specific sites, nor to simply, "general areas" that have been identified along coastal portions of the project area.

HIA-2
cont.

The entire Couverden area lies in a zone that is tectonically unstable and continues to rebound from the crushing masses of ice associated with past glacial events. This rebound has resulted in rapid changes in coastal elevations over the past 10,000 years. Pre-historic sites on the coast some 5,000 years ago can now be found a mile or more inland and at elevations several hundred feet above the present sea level. Pre-historic sites, now covered with dense vegetation and trees, have been documented in uplands far from the coastal areas of today.

HIA-3

Oral tradition as well as archaeological evidence indicates that this area is in many ways a place of origin within Huna Traditional Territory and thus, a testimony to the survival of our people on this land. Locally, we refer to the area of the proposed Couverden project, even today, as the "Homeshore". We would ask that this be more seriously considered, especially in light of the previous development, road building and clear-cut timber harvesting that have already occurred in the vicinity of these proposed sales.

The Excursion Inlet-Point Couverden area is one of early, indeed pre-historic, permanent settlement. In this area the evidence of a number of village sites, as well as the remains of large houses, graveyards and split log burial structures, are known to our people. The rich legacy of this area has long been known to the Kaagwaantaan Clan and is confirmed by a number of Tlingit Place Names that relate to specific sites in the vicinity of the proposed project area. It is only within the past forty years that knowledge of this area's significance has been realized and confirmed by researchers, previously ignorant to the area's past and significance.

HIA-4

Archaeologist Robert Ackerman, summarizing his investigations into the archeology of the Glacier Bay Region of Southeastern Alaska, after searching many sites where little was found that "smacked of antiquity", except for late historic Tlingit fishing camps or the left behind traces of non-Native mineral or fishing exploitation, noted that, ...**"Upon investigating along the shore from Excursion Inlet to Point Couverden we came upon one site after another and for the first time found winter villages. This area was of utmost importance in unraveling the threads of the region's history."**

The areas of the proposed Couverden Timber Sales are some of the most culturally, historically and indeed, pre-historically significant locations throughout the Icy Strait region. In demonstrating the early occupancy of the area, they essentially define the Huna Kaagwaantaan and others whose ancestry is connected with this place. This area continues to be of utmost importance in unraveling the threads of this region's history and it should be protected against further development, road building and clear-cut timber harvesting at all cost. Protection of the cultural and historic resources of this area deserves the strongest consideration.

The Clans of Hoonah, and in particular the Kaagwaantaan Clan, continue to hold sacred, the memory of this entire locale, for it was here that our ancestors survived both a pre-historic and a historic period, epochs that we are now beginning to more fully understand and appreciate. Certainly, it is here, that our ancestor's graves continue to be honored, evidence of the epic experiences that our people have endured through time.

HIA-4
cont

In addition to our concerns for the protection of cultural, historic and subsistence resources within and adjacent to the project area, the Hoonah Indian Association wishes to voice our concern for the impact that the proposed level of development will have on other Land Use Designations established for the area according to the Tongass Land Management Plan.

Timber Production is only one of the uses identified under the Plan and we are well aware that Point Couverden and areas of the Homeshore were previously clear-cut in the late 1970's and again in the early 1990's. This activity has resulted in the construction of nearly 50 miles of roads and some 1700 acres of clear-cuts.

I am reminded that in 1984 and 1985 the Forest Service spent over five and a half million dollars constructing nearly 30 miles of roads and putting in 8 bridges in preparation for the sale of Couverden timber, which initially drew no bidders. Then, after the Alaska Pulp Company came forward as an interested buyer, the price for 55 million board feet of Couverden timber had been reduced to less than \$115,000. This represented an economic return of about 2% of what the public spent building the roads to access those trees. Neither past nor current project economics can justify further development and harvest of this culturally significant land.

HIA-5

Rather, we would hope that the Forest Service would focus its attention on the other uses for which the land has been designated, specifically for the protection of Subsistence Opportunity, the Scenic Viewshed, which directly supports Tourism and Recreation and Old Growth Habitat that will ensure sustained, healthy fish and wildlife populations.

In an August 14, 2002 Juneau Empire article, the Forest Service stated that the proposed Couverden logging project would improve fish passage near existing roads by restoring "blocked and failed culverts". The Hoonah Indian Association suggests that if there are indeed problems with culverts and fish passage from past logging and road building the Forest Service should consider habitat rehabilitation and not further development as a means for addressing these problems.

We fail to see how the intended industrial harvest of mostly small hemlock (80%) and spruce (20%) trees is either an affordable proposition, due to the area's remote location and challenging terrain or a sensible approach to providing timber to achieve Forest Service objectives. We would prefer to see the Forest Service design timber sales that support small scaled, sustainable timber operations.

Finally, protecting the Couverden Viewshed and its value for tourism and recreation is becoming increasingly important to our Glacier Bay/Icy Strait region. The flight corridor

between Juneau and Glacier Bay National Park and Preserve has become one of the busiest flight routes in Southeast Alaska. Additionally, with the advent of operations at the newly developed Icy Strait Point cruise ship destination, located at the entrance of Port Frederick near Hoonah, cruise ship traffic along this corridor will be at an all time high. The value of the region's Viewshed has never been more important and needs to be protected for all time, especially for industries that are so economically significant to our region now that the timber and fishing industries have declined.

HIA-5
cont.

After weighing the economic resource advantages and the cultural, historic value of protecting the Couverden Project Area, against the cost and economics of further development, road construction and timber harvest, the Hoonah Indian Association stands with the Kaagwaantaan Clan in their request that the Forest Service reconsider their proposed alternative and choose to enhance and preserve the value of the land and not diminish it.

Regarding the Couverden Timber Sales, the Hoonah Indian Association, therefore, encourages the Forest Service to take No Action, an alternative, under which the project area would have, no road construction, LTF development or timber harvest.

HIA-6

I thank you for the opportunity to submit these comments.

Sincerely,

Frank Wright Jr.
Frank Wright Jr.
President

Response to Frank T. Wright, Hoonah Indian Association

HIA-1: Your comments on the Hoonah Indian Association and on the Kaagwaantaan Clan of Hoonah are noted, as are your comments that clan members have come forward with strong objections to road construction, timber harvesting, and use of the LTF.

HIA-2: Your comment that the strong connection that the Kaagwaantaan Clan has with the Couverden area is not limited to the archaeological confines of certain sites nor to general areas that have been identified along coastal portions of the project area is noted.

HIA-3: No heritage sites were found in inland areas during surveys for this project or on previous surveys in the Couverden area. As you note, the Final Resource Report for Heritage Resources contains information on prehistoric and historic cultural or heritage resources in the general Couverden project area. The data presented in that report represent a summary of research of available published sources, as well as site and report information available through the Office of History and Archaeology, Alaska Division of Parks, Department of Natural Resources, Anchorage. None of those sources contained information regarding the location of cultural or historic resources located substantially inland or at elevations above 100 feet. In fact, one of the oldest sites in Southeast Alaska, known as Groundhog Bay 2 (radiocarbon dated to between 10,180 and 9,130 years B.P.), is located just above sea level on land in Groundhog Bay. We certainly would be interested in specific information about sites that you or any clan members might have. This is part of the reason for publishing and circulating the DEIS.

HIA-4: As you note in your letter and as was reported in the Final Resource Report for Heritage Resources, there is a considerable concentration of village sites, burials, and fishing camps along the shores of the southern Chilkat Peninsula. The inventory for cultural and historic resources was conducted on National Forest System land within the project area and the located sites are included in the report. It appears that this may be an area of more limited prehistoric and historic activity and settlement than much of the rest of the shoreline.

We held meetings in Hoonah (refer to Chapter 1) in attempts to gather information on Native use of the Couverden area and locations of specific sites that are considered to be of cultural importance. One stated intent of the Forest Service was to solicit specific information about cultural and historic resource sites in the Couverden area. While your letter generally addresses Hoonah, specifically Kaagwaantaan Clan, use of the area, specifics are not presented. An option to revealing information about specific sites that might not be comfortable or in line with tradition, would be to indicate units where timber harvest would affect sites. Another option would be to hold confidential meetings with the Forest Service during which site-specific information could be discussed.

HIA-5: Your comments that rather than concentrate on harvesting low-value hemlock the Forest Service should concentrate on other uses for the area, such as subsistence uses, protecting the scenery values, improving fish passage, and tourism, are noted.

HIA-6: Your support for Alternative 1, No Action is noted. Alternative 1 would not meet the Purpose and Need for the project, as stated in Chapter 1 of the EIS. Alternative 1 would not manage the timber resource on suitable timber lands for production of saw timber and other wood products, it would not contribute to meeting the annual market demand for Tongass National Forest timber (including the needs of the local community), provide opportunities for resource uses that contribute to the local and regional economies, or support a wide range or natural-resource employment opportunities within Southeast Alaska.

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Ann Yates

3/24/04

Couverden DEIS Comments
Juneau Ranger District
8465 Old Dairy Road
Juneau AK 99801

To Whom It Concerns:

I am writing concerning the proposed Couverden Timber Sales. I live in Gustavus and I am strongly opposed to clearcutting any more of the Tongass Forest. I used to commute by plane between Juneau and Gustavus and looking down on the patchwork of clearcuts in the wilderness was always a painful reminder of how short-sighted and ignorant people can be.

AY-1

Clearcutting forests benefits no one. The wood is being sold for a pittance, very few jobs or income are being created for Alaskans, the very essence of Alaska that brings in our greatest economy –tourism – is being destroyed, and the healthy forests that still put food on the table for many Alaskans are becoming a thing of the past. Why would we do this? Why would we destroy the gifts of Alaska for literally pennies, and nothing more?

AY-2

I strongly urge you to consider Alternative 5 which would entail small-scale, selective logging. This would have many benefits, including creating jobs/income for locals, actually using the wood here in Alaska where it would be given the value it deserves, preserving the natural beauty of our where we live, and allowing wildlife and wild plants to continue to be part of our daily living.

AY-3

Thank you for your consideration.

Ann Yates
PO Box 155
Gustavus AK 99826

Ann Yates

Response to Ann Yates

AY-1: The preferred alternative proposes a mix of clearcuts with reserves and selection harvest.

AY-2: There is no evidence that we are aware of that tourism has been harmed by past harvest along Icy Strait, much of which was much more extensive and visible than the harvest proposed in this analysis. In fact, tourism has been increasing.

AY-3: Your support for Alternative 5 is noted. Alternative 5 responds well to Issue 1: avoiding road construction and timber harvest in roadless areas, as do all the action alternatives except Alternative 2. It responds better to Issue 2, emphasizing alternatives to clearcutting, and to Issue 3: protecting scenery, than the other alternatives. It does not respond well to Issue 4: timber sale economics. It would provide the lowest timber harvest volume of the action alternatives (between 1 and 5 mmbf over the next decade) and it would have the second highest costs among the action alternatives. It would not meet the Purpose and Need for the project as well as other action alternatives. It would contribute less toward meeting the annual market demand for Tongass National Forest timber than the other action alternatives. While it would provide opportunities for resource uses that contribute to the local economy, it would contribute less to the regional economy (Southeast Alaska) than the other action alternatives. Please refer to the Comparison of Alternatives section of Chapter 2 and the Purpose and Need section of Chapter 1.

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ANICLA Subsistence Hearings

The Forest Service held ANILCA 810 subsistence hearings in Gustavus, Alaska, on March 18, 2004, and in Hoonah, Alaska, on March 17, 2004. Ten people testified during the hearing in Gustavus and three people testified during the hearing in Hoonah.

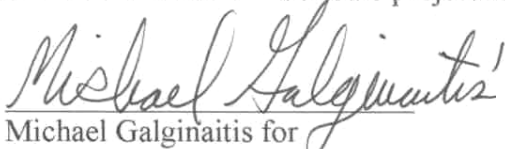
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United States Forest Service

Couverden Timber Sale

ANILCA Hearing Transcript, Gustavus, Alaska (March 18, 2004)

I certify that this is a true and valid transcription of the ANILCA Hearing conducted in Gustavus, Alaska on March 18, 2004, as recorded on the recording provided for inclusion in the Couverden Timber Sale project record.



Michael Galginaitis for
Applied Sociocultural Research

03/24/04
Date

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David Carr: Okay, this is a public meeting for an ANILCA 810 Hearing for the Couverden Timber Sales. My name is Dave Carr and I have been delegated by the United States Forest Service as the Hearing Officer for this proceeding.

I would like to welcome everyone who came tonight and express my appreciation for your interest in this project and your effort to be here for this subsistence Hearing.

The purpose of this Hearing is to receive your views on the alternatives proposed for the project and how they may affect your subsistence use of the project area. We are also interested in your comments and will accept them for the record.

For the record, today is Thursday, March 18, 2004, and the time is 7:09 P.M. This Hearing is being held in the Gustavus Community Center in Gustavus, Alaska. Public notification of this Hearing was made by publication in the Juneau Empire and notices posted in the community and on local radio.

The Hearing hours tonight are from now until 8:00 P.M. We can go longer if necessary. If you have not done so, please sign-in on the sign-in sheet up here at the front of the room. Please clearly print your name, address, and if you are representing anyone and indicate if you would like to give oral testimony tonight. Written testimony will also be received, and there are paper and pencils available at our sign-in table.

When giving testimony, please sit here in the chair to my left, near the microphone so that your testimony can be recorded. Please state your name, your full name, and spell it for the record. It's very important. When you come up to testify.

If you wish to give additional testimony, if you want to go – I'll leave that out.

An opportunity to discuss and obtain information about this project was provided during the open house that preceded this Hearing. During the Hearing, no questions can be answered other than those concerning the Hearing procedures. Are there any questions concerning the project or the project location at this time?

I see none.

If not, we are going to get started. We will start with the – I didn't have people sign in on the list, but we will start giving oral testimony at this time. Who would like to go first? Do I have a volunteer?

[Some laughter and a little pause before people sort themselves out a bit]

Come on up

Judy Brakel: Where should I sit?

David Carr: Right over here

Judy Brakel: Okay. Hello. Thank you for this opportunity. My name is Judy Brakel. I live here in Gustavus, Alaska and I have lived here a long time.

David Carr: Excuse me, could you spell your name?

Judy Brakel: B-R-A-K-E-L [spells last name]. I use other areas in the Icy Straits area for subsistence. Actually, I don't use the project area much at all for subsistence. Some berry picking of huckleberries and blueberries and some salt water salmon fishing, and whereas some of those salmon may be spawning in those streams there, most of them are probably going on by. Nevertheless, the area is important to me for a number of reasons. I have actually spent a

lot of time on the ground and camping and walking around there. It is important to our community for a lot of reasons and I want to use my time this time to briefly state my objection to this new Forest Service policy of no public hearing on the timber project alternatives themselves outside of the issue of subsistence. I think we've had a load of bad examples in very, in our country's recent history of what happens – the Vice-President Chaney's energy committee, which held no public hearings, which was different from what usually happens. And now there is continuing suspicion that Enron and so forth [?] were the major players, but nobody can find out. There were no public hearings on the weapons of mass destruction and Al Quida ties regarding the war on Iraq, before the war. Public Hearings also improve all of the public's knowledge. I remember when, in Juneau, the AJ mine was proposed and the environmental impact hearings were held. Most of us knew very little about large mines and we all learned a great deal in that process, as did the government. Those public hearings were vitally important and I urge the Forest Service to change its policy. The Tongass is not just some little forest around here that we can go visit. It is our whole region. It's our world and we want to have hearings on the major actions. And for the FS to say that they will not hold any more public hearings on any actions in Alaska I think is a really big mistake.

Dave Carr: Thank you. Someone else like to speak?

Unknown: I'm not going to go up there and state my name and stuff ...

Dave Carr: Now, this is a formal hearing. It has to be done this way or no way.

Unknown: I think it is very intimidating, [garbled on record] strange.

Dave Carr: I'm sorry, but this is the way that the process for a formal hearing is held, and it will have to be done this way. And I don't have a choice in the matter. This is the way it is done. Is there anyone else who wishes to speak?

Carol Dejka: My name is Carol Dejka, D-E-J-K-A [spells last name]. I'm a resident of Gustavus, Alaska, right now. I also want to protest the fact that there won't be a hearing on the alternatives. I think there needs to be public hearings on all the actions that the Forest Service takes in our back yard. I've been in Alaska for over 25 years and have attended numerous public hearings on Forest Service cuts. And I, in my mind the basic problem is you have your laws and we have our common sense and two of them just don't meet. And I wonder why after all these years of trying to be reasonable we're still coming to you and almost pleading with you to still listen to us. Some of our ideas are very good, as with the alternative that the local community has chosen for this Couverden cut, and I wish that you would review it once again, and maybe even talk to us and find out why it is that this would be the best thing. Thank you for giving me this opportunity.

Dave Carr: Anyone else? What's the term I use, I put it on hold? I'll recess until, I'll go off the record now until another Speaker comes forward. Go ahead, we have another speaker coming forward.

Heidi Robichaud: My name is Heidi Robichaud, last name is R-O-B-I-C-H-A-U-D [spells last name]. I'm not a heavy subsistence user of that area, however I would like to support Alternative 5 because Alternative 5 allows greater participation in the value-added forest products industry in Gustavus and I consider that to be actually a part of our subsistence lifestyle because it allows us to maintain a way of life that is based on the resources that are available in this area in the immediate vicinity. I would be strongly opposed to this cut, these trees, going to timber operators from other regions and also for any of this wood to be shipped out of the state. I've been in Alaska for about 30 years and I think subsistence is more than just

taking products from the land. It is a way of life. And I would also like to agree with some of the other comments previously about the lack of – the new regulation that prohibits the public hearings. I think that is a travesty. And it is extremely crucial that the Forest Service is able to keep in touch with the people that are most affected immediately by the cuts that are right in their own back yards. So, I also appreciate your coming out here and giving us the chance to say something. Thank you.

Dave Carr: Thank you.

Janus Kunat: My name is Janus Kunat – last name is K-U-N-A-T [spells last name]. And I am a resident of Gustavus and I would like to support the initiative that comes from Gustavus that protects clearcutting the wood. I would like to say that anybody who allows to clearcut the old growth wood and to sell it for nothing, their name should be displayed for generations to come, as, you know, a scary thing. Position 5 allows the residents of this area to leave, to use the wood for a long, long time and to use it in the right way. I think the clearcutting and selling the wood at its worth, probably 20 or 30 times, or 100 times more than what it is sold for, it's a crime. Thank you very much.

Dave Carr: Thank you.

Greg Streveler: My name is Greg Streveler – S-T-R-E-V-E-L-E-R [spells last name], 40-year resident of Gustavus. I've spent a lot of time at Couverden, partly under contract to the Forest Service. Actually, I'm a wildlife biologist by trade, and I know the area pretty well, both professionally and as a citizen. And you can see we're all having a problem kind of struggling with how to respond, because of the framework. If you look at the area very narrowly from the standpoint of subsistence, the fact that there aren't basically any deer there and there's real few moose makes that most of us aren't going to haul any meat off there very much. And [we] tend to spend time in places where there is a lot of meat, so we aren't going there [to the Couverden area] for those purposes. We pick berries. But in a broader sense, like several people have said, Couverden is very important to us. If you look at a map of Icy Strait, there is an awful lot of heavily protected area in Icy Strait, which in one way is really good, but it kind of points us to Couverden as sort of our breadbasket, in a way. There are various kinds of breadbaskets here. We have places for deer. We have places for berries, we've got places we fly over when we go to Juneau. All of that matters to our lifestyle and in that sense it's all subsistence and Heidi put it real well I thought. We can't put it all in a parcel and say we are talking about subsistence now and later we are going to talk about timber harvest or whatever. But, I guess my comments sum up to say that it's really difficult to find a coherent way to describe to you what this place means when we break it into little pieces. And after this meeting we are going to talk amongst ourselves and we'll do a lot better job I'm sure of saying what the place means to us. But even though all of us are groping for trying to describe to you why this matters to us, it matters to us a lot. And, it doesn't fit into the statistical category of subsistence very well, but it's real important to us. Thank you.

Dave Carr: Thank you. Do we have anyone else that would wish to speak?

Vince Schafer: Vince Schafer – S-C-H-A-F-E-R [spells last name] – what's your name?

Dave Carr: Dave Carr

Vince Schafer: Dave Carr. Well, I didn't come to this meeting prepared to speak. I'd like to support Greg's proposal, proposal number 5. I've got a small sawmill operation and I fish.

That's how I make my living and it feeds our family, and it works and so I assume we're – that's considered successful. There's two other operations I see here are similar, but – I don't want to speak for anyone else but from what I can see a 7 million or a 10 million board foot sale is pretty much meaningless to us. That's probably more than I will mill up in a lifetime, but a 100,000 board foot, 5, maybe between the three of us 500,000 board feet – that's conceivable. Maybe that's a realistic number and that's something we could probably use and so we're concerned – what the seven and the larger contracts mean to us is that when we get around to needing wood we're not going to have any because it's gonna be gone in Japan or wherever else. Whether that's right or wrong, you know, I'm not passing judgement on, but I'm concerned because we have at least three operations right here that need to feed our sawmills too and I'm wondering where we're going to find out timber. So that's why I support the proposal for smaller contracts. It can't be much easier, just out our backdoor. I mean it's perfect for us because it's right up Icy Passage. I had a small contract with the Forest Service at Port Frederick this summer and I towed seven log booms across Icy Straits and that's a project, and this is perfect. So that's why I support it. Yeah, that's it. Thank you.

Dave Carr: Thank you. Anyone else?

Steve Little: Hello. My name is Steve Little – L-I-T-T-L-E [spells last name]. And I definitely want to back up everything Vince said. I'm one of the other sawmill operators here. I've worked in the wood business for over 20 years here in southeast, sawmill and logging, building, carpentry. Cut wood for a lot of people who do a lot of different things with it – from furniture making, ??, building houses, and our biggest problem is access to wood for small operations. I went to all the meetings in Sitka years ago, with the Tongass reform. You know, the pulp mills were shutting down, the Japs were out, the gypos were going to go back to work. I'd like to see it happen and Couverden would be a good place for the Forests Service to put that into operation. Keep the place looking good. The small guys could go in there and harvest a little bit of wood that is prime and you wouldn't even see it look like anything's happened. It'd feed a lot of different people working throughout southeast Alaska with wood, for different projects. So I support the plan 5, on your [maps]. Thank you.

Dave Carr: Thank you.

Karen Taylor: Hi. I'm Karen Taylor – T-A-Y-L-O-R [spells last name]. I think it's really important that we don't sell millions of board feet that aren't going to benefit people locally. I think it's important that we have timber available for local businessmen. We're talking about fishermen going out of business. We're talking about loggers going out of business. We need small operations to be viable to maintain local economies. And in turn I think it's those small operators that are going to take care of the forest, that are going to keep them in perpetuity. What good does it do to sell millions of board feet for nothing, especially if you are going to sell it to a country like Japan, which has incredible wealth but is going to pay only pennies for those board feet and destroy your forests forever. They have plenty of forest land. I grew up in Japan. I grew up in Japan. I know what that country is like. I go there all the time. They have plenty of forest land, and it's all going to waste because no one maintains it. No one maintains it because it is a lot cheaper for them to buy it from the U.S. Forest Service for pennies. Thanks a lot.

Dave Carr: Thank you. Do we have anyone else?

Kim Heacox: Hi. My name is Kim Heacox – H-E-A-C-O-X [spells last name]. I make my living here as a writer and a photographer. And as a photographer I have found there is a tremendous appetite around the world for a wild Alaska, a somewhat untouched Alaska, a pristine Alaska, call it what you will. And I've noticed doing photography that it's difficult – I didn't think that I would speak on this coming here. This occurred to me in the last ten minutes, listening to people, but this is true. That if you are out in Icy Strait or Frederick Sound, Chatham Strait, you are always trying to get pictures of marine wildlife – whales, for example – without clearcuts in the background. They won't sell. The editors want pictures that are their image and hope of Alaska. So it is interesting – I remember that I was out with a friend of mine, and a friend of Karen's too, [name not familiar to transcriber], ten years ago or so, and he kept saying "Background is important. Background is important." So you have the whale in the foreground, but you want ... It's an unmarketable picture, it's something you can't sell or make a living off of, if it shows a clearcut in the background. So I see then that this type of wholesale logging does compete with another way to make a living, as an artist or as a journalist. You can sell pictures of a clearcut as photojournalism, as a story perhaps on the mismanagement of Alaska's forests, but ... I think that there's that, like Greg said, that intellectable something that none of us can speak to. We don't even, we aren't even equipped with the proper language to convey what there is at stake here, especially when you consider how the values in our country have changed over 400 years. Some have not – the ones that Moses came down the mountain with haven't really changed. That's good – but others have. And we are addressing one of those tonight. And so I just wish the Forest Service would consider a local or regional small-scale forest operation where people could mill the lumber. You know, just run their boats over there, take what they need, bring it back here, mill it out, build their homes. That's a beautiful thing, I think. So, I would like the Forest Service to consider the competition this type of management creates to the tourism industry, or not just the tourism industry but the imagery industry, for Alaska. It's the Africa of America. And it's a huge sense of hope for people out there that are driving the New Jersey Turnpike every day. Thank you.

Dave Carr: Thank you. Do we have anyone else wishing to speak? Okay, we'll go off the record right now. We promised that we would be available until eight o'clock as part of this hearing, so we will be off the record. We will stay here until eight o'clock if anyone else wishes to go on the record as far as the subsistence portion of the Hearing, we will open the record back up [stop recorder approximately 7:33 PM].

Dave Carr: The subsistence Hearing is now back on the record. It is 8:00 PM. We have had no further individuals wishing to speak. I now declare the subsistence Hearing closed. It is now 8:00 PM.

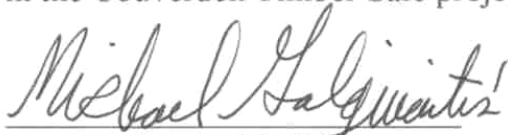
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United States Forest Service

Couverden Timber Sale

ANILCA Hearing Transcript, Hoonah, Alaska (March 17, 2004)

I certify that this is a true and valid transcription of the ANILCA Hearing conducted in Hoonah, Alaska on March 17, 2004, as recorded on the recording provided for inclusion in the Couverden Timber Sale project record.



Michael Galginaitis for
Applied Sociocultural Research

03/24/04

Date

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David Carr: Okay, this is a public meeting for an ANILCA 810 Hearing for the Couverden Timber Sales. My name is Dave Carr and I have been delegated by the United States Forest Service as the Hearing Officer for this proceeding.

I would like to welcome everyone who came tonight and express my appreciation for your interest in this project and your effort to be here for this subsistence Hearing.

The purpose of this Hearing is to receive your views on the alternatives proposed for the project and how they may affect your subsistence use of the project area. We are also interested in your comments and will accept them for the record.

For the record, today is Wednesday, March 17, 2004, and the time is 6:04 P.M. This Hearing is being held in the Hoonah Ranger District Office in Hoonah, Alaska. Public notification of this Hearing was made by publication in the Juneau Empire and notices were posted in the community and on local radio.

The Hearing hours tonight are from 6:00 P.M. until 7:30 P.M. If you have not done so, please sign-in on the sign-in sheet here at the corner of the room. Please print clearly your name, address, and if you are representing anyone and indicate if you would like to give oral testimony tonight. Written testimony will also be received, and there are paper and pencils available at the sign-in table.

When giving testimony, please sit here in the chair to my left and near the microphone so that your testimony can be recorded. Please state your full name and spell it for the record when you come up to testify.

If you wish to give additional testimony you will have the opportunity to do so after everyone else present has had a chance to speak.

An opportunity to discuss and obtain information about this project was provided during the open house that preceded this Hearing. During the Hearing, no questions can be answered other than those concerning the Hearing procedures. Are there any questions concerning the project or the project location at this time?

I hear none.

If not, we are going to get started. We will start with the first person on the sign-in sheet and go in the order that people have signed-up. The first testimony will be given by, and I need to get the sign-up sheet, when you are ready – okay. [some intermediate back and forth of no substance]. Thomas, you are first, if you would like to come up hear.

Go right ahead and speak into the microphone, and give your name and please spell it.

Transcriber's note: Mr. Mills introduced himself with his Tlingit names, Tlingit clan affiliation, and Tlingit clan house identities, but the transcriber failed to ask Mr. Mills to spell these for the record, and the transcriber lacks facility in Tlingit.

Thomas Mills: My name is Thomas Mills, Senior – T-H-O-M-A-S M-I-L-L-S [spells name], SENIOR, and my Tlingit name is [Tlingit name], and my other Tlingit name is [Tlingit name], and I am from Raven ([Tlingit clan affiliation]). I'm from Snail house ([Tlingit clan house identity]), [second Tlingit clan house identity], which is Heg[? Unclear on recording] house. I was born and raised in Excursion Inlet, and disabled from the Vietnam War. I was stationed over there from 67, 68, and 69, and pretty much can't handle being around people, and have a little homestead over there in Gustavus. And I have been to almost all the rivers and climbed almost all the mountains in this area, starting as a child. I think I killed my first bear when I

was 4 or 5 years old – snuck father’s rifle out of the house and went after that bear that kept bothering us and just eliminated it. But, over at Point Couverden you have some of the biggest deer that you have ever seen around here, and some of the prettiest wolves, in all different color phases ever hanging around here. And lately there is a big push on moose because of the logging roads that are already pushed in there, and the thing that kinda worried me mostly is that if they do log it out, the moose are going to be easier to spot, the deer will be easier to spot. The wolves will have a hay-day killing them deer up in the winter, for the deep snow. And, every time, if you look around here in Hoonah, as an example, you get logging trucks out there, you’re going to have accidents, you’re going to have oil spills, you’re going to have all this stuff over there and you’re going to have people that don’t care. You’re going to have mechanics chasing that equipment around and when they change filters and stuff they’ll just chuck it into the bushes like they do over here, and all that is going to wash down into the watershed and its going to wash down into all the plants. As a Tlingit I have been fighting with cancer for 4 years now, and sometimes I go down to the University of Washington Medical Center and they don’t give me too much time to live. And I come back up here to Alaska and I eat the plants and stuff that old man George Davis told me to eat, and Point Couverden, over by my cabin in Excursion Inlet is about the only places where I can get these plants, and when I do have these plants and consume them and go back down to the University Medical Center and they are all baffled because they can’t find anymore cancer cells and they’re trying to figure out why. So I’m kinda an experiment to them – they’re just taking tissue samples here and there to see what I have that they don’t. But there’s a lot of those plants down there. There is one little plant that has a star for a flower. You can pick the leaves off of that. I think it has two leaves. And, you can boil that up and add it to your teas, and that will get rid of your stress. And that’s what you usually add to your Devil’s Club juice and stuff over there so it will eliminate the stress too. It’s nothing narcotic, and we don’t know what it is – it just works. There’s very few places around here. You can only find it mostly at where there’s earth slides, in very few places can you find it. Over in Excursion Inlet side they seem to grow like weeds. But there’s also flying squirrels over there, and they are active at night. So if they log that whole area out you’re going to eliminate those flying squirrels. And a lot of people never knew there were flying squirrels over there until recently. But we knew they were there all the time because, when we used to trap there with father as a child, we used to, we set too close to flatimes [?] over there or the hills over there, instead of getting them marten and stuff for trapping instead we got a load of flying squirrels. And we couldn’t see ‘em during the day so we just figured they were active at night. And when we started getting flying squirrels in our traps we just used to move up a little, to a higher elevation. Again the marten and stuff on Chichigof island were transplanted by the Forest Service to control the squirrels and they are a hard time getting good because they are calico, And over there on the mainland their hides are solid colors and they are worth a lot more and they are bigger. But all this is going to be all destroyed, and sometime in the future again, the way we are running out of oil and stuff, says we are going to going back into the same cycle again as harvesting and building our own cloths again. Because, in the long run it seems like all this property here was for sale before, all this timber, and nobody bought it. And I think its pretty low-grade stuff, because – I load these log ships over here, and the high-grade that’s up here is very mixed high-grade compared to the standard sale like in Klawock. So there’s a big difference, and for some reason the logs up in this area have more water content than the logs down same Klawock area. So that was the problem why the Japanese weren’t so hot on buying the logs up here right away. But a lot of the fish creeks over there, some of the logging that’s already been done over there, has already been affected. Some of the logging that’s already been done over there, there’s no more goats on the hills because it don’t take too long for them loggers to just run up them hills and slaughter them goat. Before

they logged out Excursion Inlet, there used to be 35 goat on one hill; 50, 56 goat on another hill; 47 goat on another hill. Then they started logging that area out and there was no more goat. And one of the biggest problems they are having now is black bear hunting, because there are 2 camps over there in Excursion now that are actively hunting bear, and they're building another one. So somewhere along the line they are going to run out of bear. And that's pretty much what I have to say, except that a lot of the drainages and stuff that you are gonna just coming out of the rivers that, if they spill anything up there, gets into the water, you're going to have a lot of beautiful fishing grounds that's going to be affected. And you are going to have a lot of clam, shellfish, and crab, and – there's a lot of fishing stuff in that whole shoreline over there that you gonna have problems with if you ever have any contamination or pollution spilled over there. There's a big problem there in Excursion Inlet now because for 40 some years over there the company has been putting antifreeze in their drains and everything in the canneries so that it won't freeze up and in spring-time they just flush it. So that's over 200 gallons a season that gets pumped in. And in that part of the bay now, the clams and stuff up there aren't too edible. You can see that right away, so we just stay away from there. And as a child growing up in Excursion Inlet, when the army first built the base over there, they killed everything – everything that would bother the army, bother the military. So everything that we depended on for food was all destroyed. All the fish creeks, they dumped all their garbage in it. All their sewage lines were pumped into the rivers. And then they has us in a fence and locked up, they had a fence around our village. They had armed guards at the gates. We were prisoners of war just like the American Orientals that were born in America. And there are gravesites of today – there's a logging road that's built on two of our relatives' graves, and every time I ask Forest Service in Juneau they say it's not their jurisdiction – it's Sitka. And when I ask Sitka, they say it is not theirs, it's Juneau's. But that needs to be corrected. I guess right now it's just an open road that goes up to all those peoples' homesites and I still have two relatives laying under there. And that's just, sale bad [not clear on recording] for Forest Service, and they are going to find a lot of grave sites over there from the ancient days, over there, Point Couverden side too, and you're going to run into the same problem. That's all I am going to say before I contradict myself. Thank you.

David Carr: Thank you very much Mr. Mills. The next speaker is Mr. David Belton.

David Belton: I'm going to pass. I wasn't prepared to give testimony here tonight, but I have in my occupation with the Hoonah Indian Association formulated written comments that have been submitted, and we participated in the tribal consultation on Monday.

John Erickson: I wrote my comments down. You got them up there. I go along with very much with what this fellow [Mr. Mills] said here

David Carr: Will you give your name and spell it please, for the record. This is an official record, this part of the ...

John Erickson: John Erickson, J-O-H-N E-R-I-C-K-S-O-N [spells name] – but you got my, what I wrote down there, so.

David Carr: It is now 6:18, and at the current moment there are no more speakers, so we will go off the record. [recorder turned off so that conversations would be off the record]

David Carr [Hearing resumed and recorder turned back on]

It is now 7:32, the record is open. There have been no further commenters on the Subsistence Hearing. I declare the Hearing closed.

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